

**PUBLIC UTILITIES COMMISSION**

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TO PARTIES OF RECORD IN APPLICATION 14-11-007 ET AL.:

Enclosed are the proposed decision of Administrative Law Judge (ALJ) W. Anthony Colbert, previously designated as the presiding officer in this proceeding, and the alternate decision of Commissioner Catherine J.K. Sandoval. The proposed decision and the alternate decision will not appear on the Commission's agenda sooner than 30 days from the date they are mailed.

Pub. Util. Code § 311(e) requires that the alternate item be accompanied by a digest that clearly explains the substantive revisions to the proposed decision. The digest of the alternate decision is attached.

When the Commission acts on these agenda items, it may adopt all or part of the decision as written, amend or modify them, or set them aside and prepare its own decision. Only when the Commission acts does the decision become binding on the parties.

Parties to the proceeding may file comments on the proposed decision and alternate decision as provided in Pub. Util. Code §§ 311(d) and 311(e) and in Article 14 of the Commission's Rules of Practice and Procedure (Rules), accessible on the Commission's website at www.cpuc.ca.gov. Pursuant to Rule 14.3, opening comments shall not exceed 15 pages.

ALJ/WAC/jt2

Comments must be filed pursuant to Rule 1.13 either electronically or in hard copy. Comments should be served on parties to this proceeding in accordance with Rules 1.9 and 1.10. Electronic and hard copies of comments should be sent to ALJ Colbert at wac@cpuc.ca.gov and Commissioner Sandoval's advisor, Jamie Ormond, at jo2@cpuc.ca.gov. The current service list for this proceeding is available on the Commission's website at www.cpuc.ca.gov.

/s/ KAREN V. CLOPTON
Karen V. Clopton, Chief
Administrative Law Judge

KVC:jt2

Enc.

Decision **PROPOSED DECISION OF ALJ COLBERT** (Mailed 11/17/2015)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California Edison Company (U338E) for Approval of its Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets for Program Years 2015-2017.

And Related Matters.

Application 14-11-007
(Filed November 18, 2014)

Application 14-11-009
Application 14-11-010
Application 14-11-011

**INTERIM DECISION ON THE COMMUNITY HELP AND AWARENESS OF
NATURAL GAS AND ELECTRICITY SERVICES PILOT PROGRAM, THE
ONGOING PROGRAM, AND RELATED FUNDING**

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**INTERIM DECISION ON THE COMMUNITY HELP AND AWARENESS OF
NATURAL GAS AND ELECTRICITY SERVICES PILOT PROGRAM, THE
ONGOING PROGRAM, AND RELATED FUNDING****Summary**

This decision approves the establishment of the Community Help and Awareness of Natural Gas and Electricity Services (CHANGES) as an ongoing statewide program, effective January 1, 2016. The ongoing CHANGES program will provide outreach, education, and bill issue assistance on natural gas and electricity bills and services to limited English proficient (LEP) consumers in the language of their choice through a statewide network of community-based organizations. CHANGES will be managed by the California Public Utilities Commission's Consumer Service and Information Division, with technical assistance and input from Energy Division.

CHANGES is currently funded from California Alternate Rates for Energy (CARE) Program contributions by customers of the large Investor-Owned Utilities (IOUs): Pacific Gas & Electric, San Diego Gas & Electric, Southern California Gas Company, and Southern California Electric Company and thus provides services in those areas. The program may be expanded to the Small Multi-Jurisdictional Utilities (SMJU) through that proceeding or another mechanism.

CHANGES will be funded at an amount not to exceed \$1.6 million a year,¹ ideally directly from the Commission's reimbursable budget because the reimbursable budget will provide greater latitude to address a range of energy

¹ Because the program will be managed by a contractor, the actual amount may be lower depending on what is proposed in the awarded bid.

assistance needs experienced by California's low income population, the LEP population, and population with disabilities. The CHANGES program helps the LEP population across the state receive bill issue assistance., and helps low income customers and customers with disabilities. Funding as part of the Commission's reimbursable budget would ensure greater staff oversight and accountability of the program, and would allow CHANGES to address a wider range of issues consumers face, and integrate consumer assistance into recommendations for Commission regulatory action on a range of issues including, but not limited to CARE.

Until a long-term CPUC funding source can be established through budgetary and/or legislative channels, the ongoing CHANGES program will be funded as a reimbursement from the CARE Program, through the end of the current 2015-2017 program cycle, and may be renewed by the Commission at the end of 2017, as needed into the next CARE cycle. The interim continued funding of the CHANGES program through the CARE budget is consistent with California Public Utilities Code, Section 739.4, which allows expenditure of CARE funds to protect low-income and senior households from unwarranted disconnection of necessary electric and gas services.

We reach this decision to establish an ongoing program based on the success of the current CHANGES Pilot which, during its four-year trial, has provided the Commission with data that demonstrates the need for and usefulness of the program. To ensure continued usefulness, and because it has been three years since the last independent evaluation of the Pilot, we direct that an independent, third-party evaluation study of the ongoing CHANGES program be conducted. The study should be produced by the end of the upcoming/next CARE program cycle.

The evaluation will be overseen by the Consumer Service and Information Division (CSID), with the cooperation of and in collaboration with the Commission's Energy Division; it will be used to inform decision-makers and program implementers of program value, and analyze issues or trends identified by CHANGES to suggest opportunities for areas of improvement in our regulatory programs. CSID should consult with Energy Division on the contract solicitation process for the evaluation and CHANGES contract, contractor selection and scope of work designation. The CPUC's Internal Audit Unit should provide assistance, as needed. The evaluation of CHANGES should inform the Commission whether in the areas served by SMJUs, CARE funding from the SMJU CARE budget should be provided to support CHANGES activities in those areas if funding for CHANGES has not been provided through the CPUC Reimbursable "On Budget" account in those areas.

When the CPUC seeks to shift funding for CHANGES to the CPUC reimbursable budget, the Executive Director should seek authorization and funding for CHANGES to serve in areas served by all Electric and Gas IOUs in California, including the SMJUs.

Because the state contracting process can take several months to secure a contractor, we permit the CHANGES Pilot to continue in 2016, on a month-to-month basis at the current funding level of \$61,200 a month until the ongoing contract is in place.

1. Background

On November 19, 2010, the Commission issued Resolution (Res.) CSID-004 and approved a one-year Community Help and Awareness of Natural Gas and Electricity Services (CHANGES) Pilot. The CHANGES Pilot is modeled after the Commission's Telecommunications Education and Assistance in

Multiple-languages (TEAM) program, which was established to assist California's significant limited English proficient (LEP) population in understanding and resolving telecommunications issues. LEP consumers who benefited from the TEAM program also requested assistance with energy services. In response to this demand, the CHANGES Pilot was created.

Similar to the TEAM program, the CHANGES Pilot has provided energy-related (natural gas and electricity) outreach, education, and resolution of disputes and needs to LEP consumers in the language of their choice through a statewide network of community-based organizations (CBOs). These services have been provided by the same contractor and CBOs involved in the TEAM program, as ordered in Res. CSID-004. The Commission also directed its Consumer Service and Information Division (CSID) to evaluate the effectiveness of the CHANGES Pilot and recommend to the Commission if it should become an ongoing program.

The Commission ordered in Res. CSID-004 that the one-year CHANGES Pilot be funded at \$500,000 through the 2009-2011 California Alternate Rates for Energy (CARE) budget, consistent with California Public Utilities Code Section 739.4, which allows expenditure of CARE funds to protect low-income and senior households from unwarranted disconnection of necessary electric and gas services. Authorized to operate statewide throughout the territories served by the large Investor-Owned Utilities (IOUs),² CHANGES is currently funded

² The four major IOUs are Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas and Electric Company (SDG&E), and Southern California Gas Company (SCG).

from CARE contributions by customers of the large IOUs, and thus provides services to the low income and LEP communities in those areas.

Payment to the contractor has been provided by the IOUs. The funding breakdown is the same structure as outlined in D.02-09-021, which set a framework for the balancing account method of recording and recovery of CARE-related outreach expenses. Specifically, PG&E contributes 30%, SDG&E 15%, SCE 30%, and SCG contributes 25%.

On November 10, 2011, through Res. CSID-005, the Commission approved the CSID's and the Energy Division's proposal for an independent evaluation of the Pilot. The evaluation, CHANGES Pilot Evaluation Report (or Level 4 Evaluation), was completed in August 2012 by Level 4 Ventures Inc. and subsequently admitted into the CARE proceeding (Application (A.) 11-05-017).

In Res. CSID-005, the Commission determined that the Pilot should continue until the Commission made a final determination on whether it should become a permanent program. Meanwhile, Res. CSID-005 increased the funding up to an amount not to exceed \$60,000 a month (\$720,000 a year) through CARE funding. The funding was increased because the demand for CHANGES services (education and needs and dispute resolution) exceeded what could be provided with the initial budget. Even with the increased funding, the CBO network, as a whole, can barely accommodate the consumers who do seek their assistance.³ CSID advises that a CBO in SDG&E territory had to stop outreach that would inform consumers of the availability of services. Although that CBO has funds for

³ Resolution CSID - 004 ordered that CHANGES must use the same CBOs that are in the current TEAM program. As a result, some of them are in locations where electricity is not provided by the IOUs but by a municipal utility. If all of the CBOs were in locations where the IOUs provide service, the network would likely exceed its capacity and would have to turn consumers away.

outreach, its budget was not sufficient to assist the increased demand which would likely result from outreach.

D.12-08-044 continued the Pilot and its funding through December 2014, as the Commission anticipated further evaluation of the Pilot during Phase II of the CARE consolidated proceeding to determine the Pilot's future.

In D.12-12-011, the Commission directed the CSID to work with the Energy Division, the IOUs, and the CHANGES contractor to develop additional Pilot data tracking and reporting requirements and to include the resulting data in the IOUs' monthly CARE reports, which the IOUs filed in this proceeding. These reports will be reviewed as part of the 2015-2017 program cycle applications for the CARE Program. The Commission again extended the duration of the Pilot to ensure services would continue while the Pilot was being further evaluated.

In D.14-08-030, the final decision on the CARE program years 2012-2014, the Commission authorized continued bridge funding for the CHANGES Pilot at a level of \$61,200 a month (\$734,400 a year) until December 31, 2015, so that the Commission could have sufficient time to determine the Pilot's outcome. The \$1,200 monthly increase reflects a 2% increase of cost of living.

On December 18, 2014, the CSID completed the CHANGES Evaluation Report (CSID CHANGES Evaluation Report or Report), which was admitted into the record on January 6, 2015. Parties were given opportunity to comment on the Report. Comments were received from the four IOUs (PG&E, SCE, SCG, and SDG&E), as well as The Utility Reform Network (TURN), Greenlining and the Center for Accessible Technology (CforAT). TURN, Greenlining, SCG, and SDG&E filed reply comments.

2. Issues Before the Commission

The issues this decision will address are (1) whether the Commission should establish an ongoing statewide CHANGES program and if so, (2) how the program should be managed, (3) funded and (4) its funding level.

3. Discussion**3.1. Establishment of an Ongoing Statewide CHANGES Program****3.1.1. The Federal and State Laws**

In *Lau v. Nichols*,⁴ the Supreme Court held that the failure of a school system to provide English language instruction to students of foreign ancestry who did not speak English violated Section 601 of the Civil Rights Act of 1964, which bans discrimination based “on the ground of race, color, or national origin” in “any program or activity receiving Federal financial assistance.”

On August 11, 2000, the President signed Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency,” which requires federal agencies to examine the services they provide, identify any need for services to people with LEP, and develop a system to provide those services to the LEP population.

Similar to the federal government, the California Legislature recognized the need to provide state agency services in multiple languages. The Dymally-Alatorre Bilingual Services Act requires every state agency that furnishes information or renders services to a substantial number of individuals who do not speak English to provide certain bilingual services. These services

⁴ 414 U.S. 563, 563 (1974).

ensure that non-English-speaking individuals are not excluded from receiving services because of a language barrier.

The California Welfare and Institutions Code, Section 15600, provides that the state shall foster and promote community services for the economic, social, and personal well-being of its citizens.

The California Public Utilities Code, Article 7, supports the use of community service organizations and CBOs in assisting low income consumers to benefit from assistance programs.

3.1.2. The 2012 Level 4 Evaluation

Filed in A.11-05-017, the 2012 Level 4 Evaluation⁵ indicates that the Pilot has efficiently provided education and bill issue assistance to its targeted clients. The Evaluation also examined the need for the Pilot based on the Federal Department of Justice's guidance document which has been applied to assist in structuring programs aimed at the LEP population. Utilizing its four-point assessment,⁶ the Level 4 Evaluation concluded that, "a program such as CHANGES that targets the needs of the LEP population in California with respect to utility bills and programs is necessary."⁷ The 2012 Level 4 Evaluation also

⁵ The Level 4 Evaluation can be found at <http://www.cpuc.ca.gov/NR/rdonlyres/EA977B31-D324-4BD9-88C0-E9225B19D038/0/EvaluationChangesPilotProgramLevel4.pdf>.

⁶ The four points are: (1) Number or proportion of LEP persons eligible to be served; (2) Frequency with which LEP individuals come in contact with the program; (3) Nature and importance of the service provided to people's lives, and (4) Resources available and costs.

⁷ Level 4 Evaluation at 19.

recommended that to be consistent with IOU outreach budgets, the CHANGES budget be increased to approximately \$1.3 million per year.⁸

Based on its review of the 2012 Level 4 Evaluation, the Commission found that “the CHANGES CBOs provide a variety of much needed services to support the California’s LEP community,” and further stated that “such a holistic program with broad focus, if effectively implemented, should be commended.”⁹

Independent studies such as the Level 4 Evaluation are essential to assessing the effectiveness of implementation and to providing decision-makers with information and recommendations necessary to make program adjustments such as the budget changes being adopted here. However, the Level 4 Evaluation, the most recent third-party evaluation of CHANGES, is now three years old. Many program improvements have been implemented since this report was issued, and LEP customer needs may have changed since that time. We therefore direct that an independent, third-party evaluation be produced to inform decision-makers and program implementers of program costs and benefits and potential areas for improvement. The first one should be produced before June 30, 2017, to inform the following CARE program cycle.

The evaluation will be overseen by CSID, with the cooperation of and in collaboration with the Energy Division; it will be used to inform decision-makers and program implementers of program value and potential areas for improvement, and analyze issues or trends identified by CHANGES to suggest opportunities for areas of improvement in our regulatory programs. CSID should

⁸ *Id.* at 42.

⁹ D.12-12-011 at 12-13.

consult with Energy Division on any contract solicitation process for the evaluation of the CHANGES program, contractor selection and scope of work designation. The CPUC's Internal Audit Unit should provide assistance, as needed. The CHANGES evaluation should also inform the Commission whether in the areas served by Small Multi-Jurisdictional Utilities (SMJUs), CARE funding from the SMJU CARE budget should be provided to support CHANGES activities in those areas if funding for CHANGES has not been provided through the CPUC Reimbursable "On Budget" account in those areas.

3.1.3. The CHANGES Pilot Program Annual Report

The CSID produced the 2013 CHANGES Pilot Program Annual Report (2013 Annual Report).¹⁰ The information for 2014 CHANGES Pilot Program is contained in the 2014 CHANGES Pilot Evaluation.

As shown in the 2013 Annual Report,¹¹ outreach, education, and bill issue assistance was provided in 27 languages as follows:

- CHANGES contacted 1,773,186 people through outreach, informing them of the existence of CHANGES services.
- CHANGES caseworkers educated 14,293 consumers.
- CHANGES assisted 1,295 consumer cases to resolve bill issues.

As reflected in the 2013 Annual Report, the CSID examined the website of all the other state utility commissions to review their bilingual services. The CSID also directly communicated with the staffs of other state utility commissions that

¹⁰ Appended to D.14-08-030

¹¹

http://www.cpuc.ca.gov/NR/rdonlyres/A67AE1DF-3A95-4264-A529-10AE4E1ED34B/0/CHANGES_2013_Annual_Rprt.pdf

had these services, but did not find any program similar to TEAM and CHANGES.

Since January 2013, CSID has reviewed every needs and dispute resolution provided under the CHANGES Pilot and determined that consumers, on average, receive more assistance than they initially requested. Of the 2,768 cases noted in calendar years 2013 and 2014, consumers received a total of 5,723 services, an average of 2.07 services per case. The needs and dispute services provided in 2013 and 2014 are listed in Table A:

	2013	2014
1. HEAP/LIHEAP Application Assistance	594	827
2. Energy Assistance Fund Application	75	46
3. ESAP Application Assistance	175	85
4. Gas Assistance Fund Application Assistance	158	106
5. N2N Application Assistance	42	81
6. Medical Baseline Application Assistance	37	70
7. Educated on avoiding disconnection	164	65
8. Educated on how to read the bill	171	154
9. Educated on CARE/FERA	84	83
10. Educated on Medical Baseline	69	9
11. Educated on Energy Efficiency/ Conservation	358	303
12. Educated on all energy assistance programs	354	189
13. Request Meter Service or Testing	42	23
14. Bill Adjustment	8	7
15. Scheduled Customer Service Visit	15	8

16. Scheduled Energy Audit	58	2
17. Set Up/Change Payment Extension	36	63
18. Set Up/Change Payment Plan	117	132
19. Stop Disconnection	97	176
20. Verified Bill	79	38
21. Waive/Decrease Deposit	2	35
22. Restore Service	11	31
23. Sign up for 3rd Party Notification	32	16
24. Enrolled in Demand Response Programs	3	0
25. Set Up Account	16	76
26. Changes to Account	96	157
27. REACH Application Assistance	6	7
28. Add or Modify Level Pay Plan	3	5
29. Core Transport Agents (CTAs)*	-	26
30. CARE High Use Customers*	-	-
31. Safety*	-	1
Total Services	2,902	2,821
* Services 29 through 31 were added to the database in late 2014		

Furthermore, the participating CBOs have educated more than 66,000 consumers on various topics. A list of the education topics for calendar years 2013 and 2014 are illustrated in Table B:

	2013	2014
Assistance Programs	4,013	7,497
Explained Bills	3,820	5,052
Conservation	2,895	4,646
Safety	1,542	2,616

Avoid Disconnection	1,233	1,566
Payment Plans	790	817
Core Transport Agents (CTAs)*	-	1,283
CARE and High Energy Use*	-	1,405
Total per Year	14,293	24,882
* Both components were added late in 2014		

Moreover, the CHANGES Pilot since its inception has provided direct assistance in 47 languages. (See Table C.)

Amharic	French	Polish
Arabic	German	Punjabi
Armenian	Hindi	Romanian
Assyrian	Hmong	Russian
Bangala	Ilokano	Somali
Bengali	Indonesian	Spanish
Burmese	Japanese	Swahili
Cantonese	Karen	Tagalog
Cebuano	Khmer	Thai
Chaldean	Korean	Turkish
Croatian	Laotian	Twi
Dari	Mandarin	Ukrainian
English	Mien	Urdu
English (Native American)	Nepali	Vietnamese
Farsi	Pashto	Visayan
Fijian	Persian	

We recognize the value of the metrics reported above in increasing program transparency and accountability, and therefore direct the CSID to produce a 2015 Annual Report by September 1, 2016, with the assistance of Energy Division and the Commission's Internal Audit Unit.

3.1.4. The CSID 2014 CHANGES Pilot Evaluation

The CSID CHANGES Pilot Evaluation¹² (2014 CHANGES Pilot Evaluation) was produced on December 18, 2014. It is based on documents on the record in the CARE proceeding (A.11-05-017) for program years 2012–2014, including IOU monthly reports, the Level 4 Report, and the 2013 Annual Report. It provides a detailed analysis of the need for the Pilot, its impact, its performance monitoring, and its social return on investment. This evaluation indicates that more than 20% (about 6.8 million) of Californians are LEP who speak more than 70 languages.¹³ Furthermore, the CHANGES Pilot has effectively assisted the LEP population. Specifically, during the evaluation period, the Pilot has:

- Provided assistance to LEP clients in 40 different languages.
- Helped 2,000 LEP clients resolve bill disputes and apply for low-income financial assistance programs to help pay their bills.
- Provided assistance in filing about 1,700 applications for financial assistance programs such as Home Energy Assistance Program (HEAP)/Low Income Home Energy Assistance Program (LIHEAP), Medical Baseline, Energy Savings Assistance Program (ESAP), and other utility specific low income programs.

¹² This Evaluation can be found at http://www.cpuc.ca.gov/NR/rdonlyres/41741990-D467-43BB-88E3-D5B515C48CEC/0/CSID_Evaluation_of_CHANGES_20141218.pdf.

¹³ The CSID 2014 CHANGES Pilot Evaluation at 11 (citing U.S. Census 2010 American Community Survey).

- Helped more than 1,885 clients receive and maintain energy access by assisting them with establishing new service, advocating on their behalf to avoid disconnection, and helping to restore service after a disconnection. Thirteen percent of these clients avoided disconnection through assistance with setting up payment extensions or payment plans.
- Reached potentially 2.3 million consumers through outreach.
- Educated 23,025 LEP consumers about energy services and bills in order to help them lower their energy usage, avoid disconnections, and understand payment arrangements.
- Assisted consumers to keep their bills in good standing. A recent sampling of CHANGES clients shows that 67% of them have energy utility accounts in good standing.
- Assisted more than 6,000 households to secure a service or dispute a bill, including helping them to restore or maintain energy service by securing financial assistance, adjusting bills, lowering or waiving deposits, setting up or renegotiating payment arrangements, or assisting consumers to apply for low-income programs.

Additionally, the 2014 CHANGES Pilot Evaluation found that the Pilot is not a duplication of the services provided through the IOUs or by the Commission's Consumer Affairs Branch (CAB). The Pilot features several unique aspects. For example, caseworkers at the CBOs will visit consumers' homes to either help them interact with other energy agents (i.e., the Energy Savings Assistance Program agents) or take them to a financial assistance agency. The current CBO network has the resources to provide face-to-face services to LEP consumers in more than 40 languages (see Table C).

Comments on the 2014 CHANGES Pilot Evaluation were received from all four IOUs. TURN, Greenlining and the CforAT. TURN, Greenlining, SCG, and SDG&E filed reply comments.

In opening comments, TURN, Greenlining, and CforAT support converting the CHANGES Pilot into a statewide program. TURN bases its support on its review of the 2014 CHANGES Pilot Evaluation and its independent familiarity with the services provided by the CHANGES CBOs.

Greenlining recommends that the Commission determine whether CARE's funds for marketing, education, and outreach services (ME&O) should be invested in CHANGES activities to meet the 2014 CHANGES Pilot Evaluation's proposed budget and to spend ME&O funds more effectively. Greenlining also recommends that CHANGES be used to inform consumers of the impact of Assembly Bill (AB) 327.

CforAT seeks clarification that consumers who do not speak English as their first language because of a disability¹⁴ are among the populations that will be served by CHANGES.

In opening comments, all IOUs support providing services to LEP consumers. For example, PG&E states, "That CHANGES should continue as a critical ongoing program does not appear to be in serious dispute." However, all IOUs question whether CHANGES should be funded through CARE. All IOUs recommend more evaluation before the Commission determines whether to convert the Pilot into an ongoing program. PG&E, SCE, and SCG recommend continuing the program during the proposed extended evaluation period. SDG&E does not comment on continuance of the program.

¹⁴ People who use sign language to communicate because of a disability do not consider English as their first language.

SCE supports continuation of the program through 2017. SCE notes that CHANGES's advocacy to secure needs and resolve disputes may be the most attractive feature of the Pilot.

SCG recommends continuation of the CHANGES Pilot but indicates that the evaluation does not support the recommended funding increase at this point.

SDG&E notes that, "Assessment of the CHANGES Program is difficult since success criteria was never established...the utilities, CSID, and the CHANGES contractor were unable to come to mutually agreeable success criteria, as noted in the compliance filing submitted to the Commission on June 24, 2013."

In reply comments, TURN states that the IOUs ignore the 2014 CHANGES Pilot Evaluation's conclusion that the CHANGES Pilot is also needed to fulfill the Commission's own consumer protection responsibilities, and that the IOUs do not understand that they cannot perform the functions that CHANGES does. Greenlining responds to SDG&E's comment that Pilot success criteria have not been established and suggests that the CSID, the IOUs, and the contractor continue to develop these criteria.

3.1.5. Future Evaluation of the CHANGES Program

Independent studies such as the Level 4 Evaluation are essential to assessing the effectiveness of implementation and to providing decision-makers with information and recommendations necessary to make program adjustments such as the budget changes being adopted here. However, the Level 4 Evaluation, the most recent third-party evaluation of CHANGES, is now three years old. Many program improvements have been implemented since this report was issued, and LEP customer needs may have changed since that time.

Funding for CHANGES came from the Large IOU CARE Program during the 2013-2015 period, and the CHANGES program will continue to be funded by

the Large IOU CARE Program until alternative arrangements are made. Therefore, we direct that up to 4% of the combined 2013, 2014, and 2015 authorized pilot budgets be set aside for an independent, third-party evaluation. This percentage range is consistent with other Commission-mandated third-party evaluation activities, such as evaluation, measurement, and verification of energy efficiency program effectiveness. We also authorize the assigned Administrative Law Judge (ALJ) to modify this percentage by ruling on good cause shown by CSID, in the event that a suitable contractor cannot be found for that amount to perform a scope of work consistent with the requirements of this decision.

We direct CSID to consult with Energy Division on the contract solicitation process for the evaluation, contractor selection and scope of work designation. The evaluation will focus on two aspects: (1) the benefits and cost-effectiveness of services delivered to customers, including comparisons to similar initiatives nationwide, and (2) the extent to which customer-related information developed through the program is used effectively to inform CPUC programs and proceedings (including identifying related barriers or impediments within the CPUC or its formal processes). The CPUC's Internal Audit Unit should assist CSID in the evaluation process as needed. In consultation and collaboration with the Energy Division, CSID will use the results of the evaluation to identify any needed improvements in the manner in which information received by CHANGES is successfully fed into Commission process to improve policies for California's low income and LEP population, and population with disabilities, and to implement those improvements they can control.

The evaluation of CHANGES should also inform the Commission whether in the areas served by SMJUs, CARE funding from the SMJU CARE budget should be provided to support CHANGES activities in those areas if funding for

CHANGES has not been provided “On Budget” from the Commission’s reimbursable budget in those areas. This evaluation should begin in 2016 and be completed by June 30, 2017.

We further direct the completion of additional evaluations once every three years thereafter, to ensure that decision-makers, program administrators, and industry divisions within the CPUC have access to up-to-date program performance data and recommendations.

**3.1.6. Testimony and Comments Regarding
CHANGES and Similar Service in Other
Proceedings**

Testimony and comments in the Commission’s Consumer Protection Initiative (CPI) and the LEP proceedings (R.00-02-004 and R.07-01-021 respectively) state that LEP consumers tend to shy away from government agencies and large corporations. Instead, they prefer to seek assistance from entities they trust, specifically CBOs that have previously helped them with a variety of issues. In the CPI decision, the Commission notes that, “We believe that we can improve our complaint resolution efforts by working more with CBOs which possess unique insights into problems faced by specific communities. CBOs have earned the trust of their constituencies, and show a passion for helping consumers.”¹⁵ In response, the Commission ordered the CSID to “...design a program that integrates CBOs into the Commission’s outreach, education, and complaint resolution processes...”¹⁶ That was the beginning of the TEAM program, upon which CHANGES is based.

¹⁵ D.06-03-013 at 101.

¹⁶ D.07-07-043, Ordering Paragraph 13 at 133.

The CHANGES Pilot was also discussed in R.10-02-005, which was initiated to address the Commission's concerns about the current economic crisis in California and an increase in residential utility service disconnections due to nonpayment. In D.12-03-054, the Commission directed steps to take to reduce the number of disconnections and stated, "It is clear from the comments of both the utilities and the consumer representatives that the CHANGES program is a promising supplement to the utility language practices at issue here, but is not, at least at this time, a substitute for them."¹⁷

3.1.7. The IOUs' CARE Monthly Reports

As previously discussed, D.12-12-011 noted that "the CHANGES CBOs provide a variety of much needed services to support the California's LEP community and do so by providing a wide range of programs and services to serve that community [...]. That said, such a holistic program with broad focus, if effectively implemented, should be commended. The challenge is deciding how to fund such a broadly focused program..."¹⁸ Therefore, the Commission determined that it needed more data to decide whether CARE program funds should be used to fund an ongoing program.

The monthly reports the IOUs filed in the previous and current CARE proceedings, A.11-05-017 and A.14-11-007 respectively, provide data related to the needs and dispute resolutions¹⁹ (referred generically as bill issue assistance)

¹⁷ D.12-03-054 at 26.

¹⁸ D.12-12-011 at 12

¹⁹ In the Pilot, there are two types of bill issues — needs (when a consumer needs assistance receiving a service, e.g., securing payment arrangements) and disputes (when a consumer wants to dispute a service or a bill, e.g., when an IOU declines payment arrangement agreeable to the consumer). Throughout the Pilot there were more needs resolutions than dispute solutions,

Footnote continued on next page

and education workshops, which demonstrate LEP consumers' demand for the CHANGES Pilot.

3.1.8. Public Comments Made at the Commission's All Issues Public Participation Hearing

On April 30, 2014, recipients of the CHANGES Pilot services attended the All Issues Public Participation Hearing in Los Angeles and described their positive experiences with the Pilot. All five of the Commissioners were present. One CBO caseworker read a statement of a Spanish-speaking CHANGES consumer. When the consumer contacted the caseworker, she expressed concern that her "bill was high" and she "didn't know how to pay it."²⁰ Then she mentioned that she "was having headaches and had a funny smell in her house."²¹ The caseworker "went with her to her house, smelled gas, [and] called emergency."²² The gas leak was "so bad that the woman was immediately hospitalized for gas poisoning."²³ As stated in the case notes in the CHANGES database, the consumer did not contact PG&E because she was afraid that she would be charged to repair the furnace. Later, the caseworker helped the client enroll in the Energy Savings Assistance (ESA) Program. The ESA contractor agreed to replace the furnace for free but refused to do it right away. Since this

which reinforces the testimony previously received that LEP clients tend to shy away from large corporations, even when they are simply requesting assistance.

²⁰ California Public Utilities Commission Jurisdiction Open Issue General Topic, April 30, 2014, Reporter's Transcript at 13.

²¹ *Id.*

²² *Id.*

²³ *Id.*

happened in winter, the caseworker worked with the utility to ensure that the furnace was replaced promptly.

3.2. Management of the Ongoing Statewide CHANGES Program

We have concluded that the CSID should continue to administer the CHANGES ongoing statewide program, since its current duties, and its staffs' knowledge, skills, and abilities align with the CHANGES program.²⁴

In reply comments to the 2014 CHANGES Pilot Evaluation, SCG argues that the Pilot should not be funded through ME&O funds. SDG&E notes that the Commission has stated, through a Joint Administrative Law Judge's Ruling on May 7, 2014, that the Residential Rates Order Instituting Rulemaking (R.12-06-013) will examine issues surrounding AB 327, including outreach and education issues.

The Commission agrees with CforAT that consumers who do not speak English as their first language because of a disability (e.g., people who use sign language) should be served by CHANGES. Since we cannot guarantee a CBO's participation in the program, we advise the CSID to make every reasonable effort to include, track and report that assistance in the statewide program.

In response to the IOUs' comments about the 2014 Evaluation's portrayal of the service the IOUs provide LEP consumers, we note that such information was taken from the IOUs' responses to a CSID data request, comments of consumers and the CBOs made at the All Issues Public Participation Hearing on April 30, 2014, and the Level 4 Evaluation Report. Staffs of the IOUs and the CAB collectively are fluent in six languages. However, when another language is used,

²⁴ See the CSID 2014 CHANGES Pilot Evaluation at 25-31.

both the IOUs and the CAB use an over-the-phone, word for word, interpretation service. This is challenging to LEP consumers because they may not know the right questions to ask. In contrast, the CHANGES CBOs provide face-to-face services in more than 40 languages, therefore building a more personal relationship with LEP consumers.²⁵

Regarding SDG&E's and Greenlining's comments on the development of criteria for success, we agree that such criteria should be further developed to aid in transparent and data-driving decision-making on the program in the future. To that end, the new evaluation process, to be instituted in 2016, should help address the concerns these parties have raised.

We have determined that the ongoing statewide CHANGES program should be similar to the Pilot with a few modifications. Similar to the Pilot, the ongoing program will be a grassroots program, managed by the CSID, with technical assistance and input from Energy Division, which provides information and assistance with energy services and bills issues in the language of the consumer's choice, through a statewide network of CBOs. Although CHANGES is a program primarily for LEP consumers, an English-speaking person will not be denied information or assistance if he or she seeks help from a participating CBO. Similar to the Pilot, the ongoing program will contain three components:

1. Outreach – The CBOs will inform consumers in their community of the existence of the program and location of the neighborhood CBO where services are provided.

²⁵ The CSID 2014 CHANGES Pilot Evaluation at 14.

2. Education – Consumers will receive information about utility service, safety, bills, avoidance of disconnection, consumer programs, and other residential energy related issues.
3. Bill Issue Assistance – Consumers will receive assistance resolving disputes or in securing something they need, such as help filling out HEAP applications, or negotiating payment arrangements.

The ongoing CHANGES program services will continue to be provided by the same contractor and same CBOs as TEAM. The contractor for both programs will be solicited through the state contracting process and through the same solicitation document. This will provide a better service to LEP consumers because the consumer who needs assistance or education about Commission regulated telecommunications services may also need information or assistance regarding Commission regulated energy services. In addition, running both programs using a common contractor can provide for a frugal and prudent expenditure of public funds. Both the TEAM and CHANGES programs can benefit by combining necessary functions, for example, utilizing the same database or using the same techniques and resources to provide training or performance evaluations. However, one program shall not subsidize the other and clear accounting matrixes shall be developed to properly track expenditures.

The modifications from the CHANGES Pilot to the statewide program include the following:

1. The Commission's CSID, as part of its management of the program, will coordinate or consult with the Energy Division about energy services, programs, collateral material, performance metrics, and any joint meetings with the IOUs, if needed. The CSID or the CHANGES contractor will also coordinate with

Energy Upgrade California²⁶ and the Community Language Efficiency Outreach (CLEO) program²⁷ to reduce redundancies, share best practices, leverage resources, and lower service costs, where and when possible.

2. Once funding source changes, the monthly meetings ordered in D.12-12-011 are no longer required. The CSID and the Energy Division will determine the necessity and format of any future meetings with the contractor and the IOUs.
3. When funding source changes, all payments to the contractor will be directly from the Commission's reimbursable budget. While awaiting approval for the program to be funded "on budget," the contractor will be paid through a reimbursable contract through CARE funds utilizing the same breakdown between the IOUs as designated for the Pilot.
4. CSID will use the State contracting process to secure a prime contractor to oversee the statewide network of CBOs, in consultation with Energy Division. The Commission, will evaluate the bidder's expertise with energy issues, its relationships with CBOs, its ability to select a suitable statewide network of CBOs, and its demonstration that a significant portion of the funding will be designated for CBOs' direct provision of services to LEP consumers. Neither CSID nor the Commission will select or manage the CBOs. The CBOs will be selected by the contractor and will be subcontracted to the contractor. The CSID may review the CBO selection methodology with the contractor to ensure that services can be provided in languages and locations most in demand by LEP customers, and may discuss the CBOs' performance during regular meetings with the contractor.

²⁶ <http://www.energyupgradeca.org/>.

²⁷

http://eestats.cpuc.ca.gov/EEGA2010Files/SCG/PIP/2013/Clean/7%20-%20SCG%203P%20CLEO%20PIP%201_14_13.pdf.

To encourage creativity, we will not specify how the contractor shall conduct outreach, education, and bill issue assistance.²⁸ Instead, bidders shall provide a detailed proposal on how the program will be implemented and how the CBO network will be designed and monitored. The program will also be evaluated by an independent evaluator, as previously discussed. To comply with state requirements to encourage fair and open competition, the solicitation document will contain details about the bid, how bids will be evaluated and the solicitation process. It will be posted and processed through the California Department of General Services (DGS) "Bid Sync" program.²⁹ Once an ongoing funding source out of the Commission's reimbursable budget is authorized, the IOUs' role will change. They will no longer be required to include CHANGES activities in their CARE monthly reports when the funding no longer comes from the CARE program.

The CSID, with input from the Energy Division, will develop other reporting requirements for the ongoing program, to be applied when a long-term funding is established through the Commission's budget. IOUs' activity should also involve, at a minimum, the following:

- A. The IOUs are directed to advise the CSID staff designee of the IOUs' liaison for the CHANGES program, the IOUs are directed to work with the CBOs (and if necessary the contractor and the CSID's staff designees) to resolve consumers' bill issues, when contacted by the CBOs.
- B. The CHANGES CBOs will act as agents of the Commission to assist consumers to informally resolve bill issues. In doing so, the CBOs may determine how to communicate with the IOUs. If a CBO communicates with an IOU while a

²⁸ However, we do require some measure of coordination and sharing of best practices with Energy Upgrade California and CLEO, as previously discussed.

²⁹ Anyone who wants to receive a copy of, or participate in, the CHANGES solicitation, or any state solicitation, must sign up through the DGS' "Bid Sync."

consumer is present, the consumer must verbally notify the IOU that the CBO has authorization to conduct business on his or her behalf. If the CBO communicates with the IOU not in the consumer's presence, the CBO must obtain a signed authorization from the consumer. This is the practice used in the Pilot, and it should continue be used in the ongoing program. No changes to this practice shall be made without the CSID's prior consent.

- C. The IOUs are directed to communicate to the CSID CHANGES designee regarding any new requirements or changes in utility residential programs, rate or rate structures, proactively. While the CHANGES program remains funded out of the CARE budget, the IOUs will continue to report on their CHANGES activities to CSID, in reports available to the Commission about their CARE activities.

3.3. Funding of the Ongoing Statewide CHANGES Program

The Commission's executive management shall seek authorization to fund the ongoing statewide CHANGES program in an amount not to exceed \$1.6 million annually, directly from the Commission's reimbursable budget. The Commission's reimbursable budget is the best funding source for the ongoing CHANGES program because the reimbursable budget will provide greater latitude to address a range of energy assistance needs experienced by California's low income population, the LEP population, and population with disabilities. The CHANGES program helps the LEP population across the state receive bill issue, and helps low income customers and customers with disabilities.

The interim continued funding of the CHANGES program as a reimbursement from the CARE budget is consistent with California Public Utilities Code Section 739.4, which permits expenditure of CARE funds to educate and assist consumers to help them avoid service disconnection. Funding

CHANGES through a Commission reimbursable account would allow CHANGES to address a wider range of issues consumers face, and integrate consumer assistance into recommendations for Commission regulatory action on a range of issues including, but not limited to CARE.

The CHANGES Pilot budget was historically represented as a CARE pilot budget line item. As the only CARE funded pilot, CHANGES represented 100% of the CARE pilots budget. The CHANGES Program budget, as a percentage of the CARE Outreach budget, will represent 5% of the 2015-authorized amounts.

Until a long-term funding source can be established, the ongoing CHANGES program will continue to be funded, up to \$1.6 million annually, as a reimbursement from the CARE Program, through the current 2015-2017 CARE program cycle. If the Commission's executive management is unable to finalize long-term funding before the end of the current 2015-2017 CARE program cycle, directly from the Commission's budget, funding of the ongoing program may be reauthorized by the Commission, and may be reauthorized from the CARE program or other funding source. However, the preferred long term funding source should be through the Commission's budget.

We have determined that the appropriate funding level for the ongoing CHANGES program at a statewide level in the areas served by the large IOUs is \$1.6 million a year. In addition to using the TEAM funding as a guide, we have considered the recommendation of the Level 4 CHANGES evaluation, and the funding and performance of another outreach program, referred to as Community Language Efficiency Outreach (CLEO). We note that CHANGES mirrors TEAM in that both programs provide outreach, education and consumer advocacy components. When the Commission approved the Consumer Protection Initiative, it requested funding to implement the initiative. As a result,

the Legislature approved \$1.9 million in funding yearly for outreach and the Commission set aside \$1.6 million for the TEAM program. The TEAM program has been funded at that level for more than six years and has been successful in providing information and assistance with Telecommunications matters. With input from the upcoming independent evaluation, CHANGES should similarly be brought onto the Commission reimbursable budget.

We agree with the Level 4 Evaluation regarding reasonableness of an increased budget. We further agree that the program would benefit from centrally developed CHANGES-branded marketing and education collateral such as flyers, branded give-aways, and educational materials, and set aside a budget not to exceed 5% of the yearly authorized budget for statewide marketing and educational materials. The Level 4 Evaluation recommended that the CHANGES budget be set at \$1.3 million a year. However the evaluation was completed in August 2012. We have determined that a yearly funding level of \$1.6 million a year is more appropriate. This will allow for increases in costs since the Level 4 report was completed, as well as allow flexibility to add services to account for changes in energy services or rates, such as the Commission's decision to change residential service to a Time of Use service by 2017 as a result of AB 327.

By way of example SCE and SCG have an outreach and training program, called CLEO, which provides energy efficiency information and energy audits in their service territories (about half the state) to Vietnamese, Indian, Chinese, Korean, Hispanic and African American communities. Its pilot was funded at \$720,000.³⁰ It provided information through classroom seminars and energy

³⁰ CSID Evaluation of CHANGES at 27.

audits. In comparison, CHANGES will provide services statewide. Its current education workshops cover eight different subjects. Considering the proposed increased duties in this program, and proposed increased reach it's reasonable to set the CHANGES budget higher.

We have determined that the \$1.6 million in annual funding for the CHANGES program will ensure more services and better coverage throughout the areas of the state served by the large Electric and Gas IOUs. We decline to set a fixed amount of CBOs or set the number of outreach, education or bill issue assistance they will provide. Instead at a minimum we indicate that we expect that the increase funding will provide the following:

1. The funding will enable the addition of more CBOs so that services can be provided statewide.
2. The funding will enable the provision of additional services, including more education workshops and additional topics (such as changes in rate design resulting from AB 327, and information regarding the location and hours of operation of cooling centers, for outages and hot weather events).
3. The funding will permit more bill issue assistance especially during extreme weather conditions in summer and winter.³¹
4. Funding of up to 4% of the pilot's annual budgets for the years 2013, 2014, and 2015 shall be set aside for an evaluation provided by an independent evaluator.
5. The increase will provide ongoing database improvements and maintenance.
6. The increased budget will provide creation and production of program-wide collateral materials such as brochures in multiple

³¹ The CAB's caseload data shows that the number of complaints increased 20% during the summer and winter high bill seasons, compared to the rest of the year.

languages, as well as signage. Collateral materials and signage expenses will not exceed 5% of the CHANGES budget.

7. The increased budget will provide a reasonable level of compensation to the contractor and CBOs. When the CHANGES Pilot was created, the Commission initially planned on reaching a decision after a year's evaluation. Due to the initial planned brevity of the Pilot, the contractor and the CBOs agreed to provide services at a discounted rate.

The CHANGES program is not a duplication of, nor a replacement for, the services provided through the IOUs, the Commission, or the CARE capitation.³² The CHANGES Program should continue to assist low income and LEP community members across the State of California, in areas served by large electric and gas IOUs.³³

3.4. Continuance of the Current CHANGES Pilot Program

The CHANGES Pilot is currently scheduled to cease providing services on December 31, 2015. It is anticipated that the process for choosing a new contractor for the program could take several months. The California Department of General Services is the controlling agency for the State's contracting process. Its State contracting manual indicates that, "The bidding

³² The CSID CHANGES Pilot Evaluations at 20-25 (comparing CHANGES with IOUs' programs and CAB). Except for TEAM, the only other similar program acknowledged by the Commission is the former Communities for Telecom Rights (CTR). CTR was the precursor to TEAM and was funded through a series of grants in advance. The grant funding method is not used for TEAM or CHANGES. Instead, the Commission will pay TEAM and CHANGES monthly, after services have been provided and after the contractor submits an invoice and supporting documents acceptable to the Commission. Additionally, the funding level for CHANGES will not exceed \$1.6 million annually throughout the areas served by the large Electric and Gas IOUs. The actual budget may be less, depending upon what is proposed in the bid of the successful bidder.

³³ The CSID 2014 CHANGES Pilot Evaluations at 29-30.

process often takes three to eight months from the time the advertisement is placed until the award is made. Resolution of protests may add a delay of one to three months.”³⁴ Therefore, to avoid a disruption of this essential service, we will continue the CHANGES Pilot on a month to month basis at the current funding level of \$61, 200 a month, until an ongoing program with a contractor chosen through the bid selection process and a CBO selection process can commence. We direct CSID and the Commission’s Contracts Office, to proceed through the contracting process with all reasonable haste. In addition, the contractor and its lead staff for the CHANGES Pilot may need time to finalize its accounting, compensate the CBOs for their services and close out the pilot program. Therefore, we permit contractor services related to the close of the CHANGES Pilot, and CBO compensation for services prior to cessation of pilot program services to consumers, to continue for sixty days after provision of services to consumers ceases under the CHANGES pilot. Payment for those services will be at the same level as the Pilot’s current budget. We envision a smooth transition from the CHANGES pilot to the ongoing CHANGES program through a new contractor and CBO selection process, without interruption to consumer services.

D.12-12-011 directed the IOUs to include CHANGES Pilot data in their monthly CARE reports and also required the CSID, the Energy Division, the IOUs, and the contractor to meet monthly. CSID and Energy Division should meet and confer to determine the future meeting schedule and inform all parties of the future meeting schedule.

³⁴ State Contracting Manual, Volume 1, Section 5.60 A at 63.

The CSID with input from the Energy Division shall develop reporting requirements for the ongoing program, to be applied when long-term funding is established through the Commission's budget.

During the interim period, the current monthly meeting is no longer required. Instead, CSID and Energy Division should meet and confer to determine the future meeting schedule and inform all parties of the future meeting schedule.

4. Comments on Proposed Decision

The proposed decision of the ALJ in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. Comments were filed on _____, and reply comments were filed on _____ by _____.

5. Assignment of Proceeding

Catherine J.K. Sandoval is the assigned Commissioner and W. Anthony Colbert is the assigned ALJ in this proceeding.

Findings of Fact

1. The CHANGES Pilot provides energy-related (electric and natural gas) outreach, education, and resolution of needs and disputes, to California's low income and LEP consumers in their preferred languages through a network of community based organizations in areas served by large Electric and Natural Gas IOUs.

2. The CHANGES Pilot, during its four-year trial, has provided data that demonstrates its usefulness for assisting the low income and LEP population and population with disabilities.

3. The CHANGES Pilot features unique and successful aspects that are not found in any other Commission or IOU services or programs.

4. Coordination and sharing of best practices with similar programs, such as Energy Upgrade California and the CLEO program, could help to reduce redundancies, leverage resources, and lower service costs.

5. The CHANGES program would benefit from centrally developed and CHANGES-branded marketing and education collateral such as flyers, branded give-aways, and educational materials. Other, similar, programs may spend up to 5% of their budget on such collateral.

6. The CSID has been administering the CHANGES Pilot program since its implementation.

7. The CSID's current duties, and its staffs' knowledge, skills, and abilities align with the ongoing statewide CHANGES program.

8. The beneficial connections between the services of the CHANGES Pilot and the needs of the CARE population and LEP and population with disabilities justify the temporary continued use of CARE funding for CHANGES until the establishment of a long-term funding source from the Commission's reimbursable budget.

9. The rate impact of establishing an ongoing CHANGES program on ratepayers is minimal. CHANGES is the only pilot project line item funded out of the CARE budget. The projected annual budget of \$1.6 million, which is only 0.0005 % of the IOUs' annually combined sales of \$31.4 billion.

10. The Commission's reimbursable budget is the best funding source for the ongoing CHANGES program because the low income population and the LEP population have significant overlap.

11. Analysis of the Pilot Program information shows that the LEP population extends farther, and that CHANGES also serves customers with disabilities.

12. The CHANGES program helps the low income population, the LEP population and customers with disabilities across the state in areas served by the large Electric and Natural Gas IOUs receive education and bill issue assistance.

13. It is useful and required by statute to conduct regular independent evaluations of pilots and ongoing programs.

14. Both reporting metrics and criteria for success are important to enable the Commission to assess the value of the CHANGES program.

15. It is anticipated that the process for choosing a new contractor for the CHANGES program will take several months.

16. Because the CHANGES Pilot has proven its usefulness to low income and LEP population, and customers with disabilities, it is reasonable to continue the Pilot on a month to month basis until the ongoing program can be implemented.

Conclusions of Law

1. The United States Supreme Court in *Lau v. Nichols* stated that one type of national origin discrimination is discrimination based on a person's inability to speak, read, write, or understand English.

2. Title VI of the 1964 Civil Rights Act states, "no person in the United States shall on the grounds of race, color or national origin be excluded from participation in . . . any program or activity receiving financial assistance."

3. Presidential Executive Order 13166 signed in August 2000 addressed improving access to services for persons with LEP.

4. The California Dymally-Alatorre Bilingual Services Act requires state agencies to provide information in the languages which their clientele communicate.

5. The California Welfare and Institutions Code Section 15600, provides that the state shall foster and promote community services for the economic, social, and personal well-being of its citizens.

6. The California Public Utilities Code, Article 7 supports the use of community service organizations and community based organizations in assisting low income consumers to benefit from assistance programs.

7. An ongoing statewide CHANGES program should be established on January 1, 2016.

8. The CSID, with input and technical assistance from Energy Division, should continue to administer the CHANGES ongoing statewide program; this program should, where and when possible, coordinate, leverage resources, and share best practices with similar programs, such as Energy Upgrade California and the CLEO program.

9. The ongoing statewide CHANGES program should be funded up to \$1.6 million annually, ideally directly from the Commission's reimbursable budget.

10. Until the Commission's executive management and the Legislative authorities bring the funding for the CHANGES program "on budget" the ongoing CHANGES program should continue to be funded through the CARE program through the current 2015-2017 program cycle.

11. The ongoing CHANGES program should be evaluated by a third party on a regular basis.

12. Spending of up to 5% of the CHANGES program budget should be authorized to develop statewide, CHANGES-branded marketing and education collateral such as flyers, branded give-aways, and educational materials.

O R D E R

IT IS ORDERED that:

1. The California Public Utilities Commission establishes a statewide Community Help and Awareness of Natural Gas and Electricity Services, effective January 1, 2016.
2. The ongoing statewide Community Help and Awareness of Natural Gas and Electricity Services program shall be managed by the Commission's Consumer Service and Information Division, with technical assistance and input from the Commission's Energy Division.
3. Daily operations of the Community Help and Awareness of Natural Gas and Electricity Services program will be administered by an outside contractor who will be selected through the state contracting process.
4. The ongoing Community Help and Awareness of Natural Gas and Electricity Services (CHANGES) Program shall be funded at a level not to exceed \$1.6 million annually from the California Alternate Rates for Energy (CARE) budget of the large Investor-Owned Utilities in the areas served by those utilities through the end of the program cycle that ends in 2017, and the Commission may consider funding CHANGES through CARE for future CARE cycles if CHANGES is not funded by another source such as the Commission's reimbursable budget.
5. The Commission's executive management shall pursue all possible options to bring the ongoing funding for the statewide Community Help and Awareness of Natural Gas and Electricity Services program "on budget."
6. Until a different budget source is approved for the statewide Community Help and Awareness of Natural Gas and Electricity Services Program

(CHANGES), the ongoing program shall continue to be funded through the large Investor-Owned Utilities California Alternate Rates for Energy (CARE) program in its current 2015-2017 program cycle. The Commission may reauthorize funding CHANGES through CARE's next budget cycle, or from another funding source if long-term or on-budget financing for CHANGES is not authorized before the end of the 2017 CARE program cycle.

7. The Community Help and Awareness of Natural Gas and Electricity Services Program Pilot will be funded at the current level of \$61,200 a month on a month to month basis until the ongoing program can be implemented.

8. While the Community Help and Awareness of Natural Gas and Electricity Services program is funded through the large Investor Owned Utilities' California Alternate Rates for Energy program, the Commission will pay the contractor directly and will be reimbursed by the four major Investor-Owned Utilities.

9. Pacific Gas and Electric Company shall reimburse the Commission 30% of the total cost for the Community Help and Awareness of Natural Gas and Electricity Services program.

10. Southern California Edison shall reimburse the Commission 30% of the total cost for the Community Help and Awareness of Natural Gas and Electricity Services program.

11. Southern California Gas Company shall reimburse the Commission 25% of the total cost for the Community Help and Awareness of Natural Gas and Electricity Services program.

12. San Diego Gas and Electric Company shall reimburse the Commission 15% of the total cost for the Community Help and Awareness of Natural Gas and Electricity Services program.

13. The Commission's Consumer Service and Information Division may allocate up to 5% of the Community Help and Awareness of Natural Gas and Electricity Services program budget to the development of statewide, program-branded marketing and education collateral such as flyers, branded give-aways, and educational materials.

14. The Consumer Service and Information Division, with input and technical assistance from Energy Division and CPUC Internal Audits Unit shall produce a 2015 Annual Community Help and Awareness of Natural Gas and Electricity Services Report by September 1, 2016.

15. The reporting, and monitoring of the ongoing statewide Community Help and Awareness of Natural Gas and Electricity Services (CHANGES) program shall be managed by the Commission's Consumer Service and Information Division (CSID), with input and technical assistance from Energy Division. Meetings with the Investor-Owned Utilities, and collateral material, will be scheduled and developed as needed, under the auspices of CSID in collaboration with Energy Division.

16. Pacific Gas and Electric Company, Southern California Edison, Southern California Gas Company, and San Diego Gas and Electric Company shall not include the Community Help and Awareness of Natural Gas and Electricity Services (CHANGES) program activities in their California Alternate Rates for Energy (CARE) program monthly reports, once the CHANGES program is no longer funded through the CARE program.

17. Once Community Help and Awareness of Natural Gas and Electricity Services (CHANGES) is no longer funded through the California Alternate Rates for Energy (CARE) program, Pacific Gas and Electric Company, Southern California Edison, Southern California Gas Company, and San Diego Gas and

Electric Company shall report on the CHANGES program as directed by the Consumer Service and Information Division and the Energy Division.

18. Pacific Gas and Electric Company, Southern California Edison, Southern California Gas Company, and San Diego Gas and Electric Company shall continue to be involved in the ongoing Community Help and Awareness of Natural Gas and Electricity Services (CHANGES) program, at a minimum, in the following ways:

- a. The Investor-Owned Utilities (IOUs) are directed to work with the designated community based organizations (and if necessary the prime contractor and the Consumer Service and Information Division's (CSID) staff designee for the CHANGES program) in resolving consumers' energy-related issues.
- b. The IOUs are directed to communicate with the CSID and Energy Division regarding any changes in utility residential programs, rate structure, or rate increases prior to their implementation.

19. The Community-Based Organizations (CBOs) will act as agents of the Commission to assist consumers in informally resolving bill issues. In doing so, the CBOs will follow the same practice as developed in the CHANGES Pilot for communicating with the Investor Owned Utilities on consumers' behalf as described in this decision. Any requested changes to this practice must be resolved by consulting with the Consumer Service and Information Division in advance to request Consumer Service and Information Division authorization for such a change.

20. The Consumer Service and Information Division, in consultation with Energy Division, is directed to determine if meetings with the Investor Owned Utilities and the contractor are necessary and so advise both entities.

21. The Consumer Service and Information Division should organize, lead, and facilitate meetings on a quarterly basis, at a minimum, with the Commission's

Energy Division, the Investor Owned Utilities (IOUs), and the Community Help and Awareness of Natural Gas and Electricity Services (CHANGES) program prime contractor to discuss changes in the IOUs' program services, new consumer materials, and updates on the statewide CHANGES program activities.

22. The Consumer Service and Information Division (CSID) or the Community Help and Awareness of Natural Gas and Electricity Services contractor shall, where and when possible, coordinate with Energy Upgrade California and with the Community Language Efficiency Outreach program, as well with as any other programs the CSID deems relevant, to reduce redundancies, share best practices, leverage resources, and lower service costs.

23. The Consumer Service and Information Division shall, initiate the process to post the solicitation to secure a contractor and manage the contractor selection process, to manage the day to day operations of the program, through the state contracting process within five days of this decision.

24. The participating community-based organizations in the Community Help and Awareness of Natural Gas and Electricity Services program shall assist consumers with limited English proficiency; however, English speakers will not be denied information or assistance if they seek information or assistance from a participating community based organization.

25. The Community Help and Awareness of Natural Gas and Electricity Services (CHANGES) program's participating community based organizations will act as agents of the Commission to advocate and assist consumers in informally resolving energy-related issues. The practice used in the CHANGES Pilot shall continue, as described in the decision. No changes shall be made without the Consumer Service and Information Division's prior consent.

26. The Community Help and Awareness of Natural Gas and Electricity Services Pilot, initially scheduled to cease on December 31, 2015, will continue on a month to month basis, at its current funding level of \$61,200 a month until the ongoing Community Help and Awareness of Natural Gas and Electricity Services program contract, including selection of community-based organizations under the new consultant contract, can commence.

27. The Pilot contractor may continue working to complete its duties related to the Community Help and Awareness of Natural Gas and Electricity Services Pilot program sixty days after services in the Pilot cease. Compensation after the close of services, may include community-based organizations' (CBO) payment for services prior to the close, and the contractor and quality assurance team's work to close out the Pilot. Compensation shall be at the same rate currently budgeted in the Pilot. Service to consumers should not be disrupted during this transition so the contractor should ensure that CBOs are in place to serve consumers.

28. Pacific Gas and Electric Company, Southern California Edison, Southern California Gas Company, and San Diego Gas and Electric Company shall include the Community Help and Awareness of Natural Gas and Electricity Services bill issue assistance and education workshop materials and attendance statistics in their monthly California Alternate Rates for Energy reports until long-term funding is established from the Commission's budget.

29. Pacific Gas and Electric Company, Southern California Edison, Southern California Gas Company, and San Diego Gas and Electric Company, the Consumer Service and Information Division (CSID), and the Pilot contractor are not required to meet monthly to discuss the Pilot's activities. But the CSID, in consultation with Energy Division, can determine when future meetings are necessary. Such meetings are encouraged to occur at least twice quarterly.

30. With the assistance of the Commission's Energy Division, the Consumer Service and Information Division shall oversee an independent, third-party evaluation study to be produced by June 30, 2017, to inform the next California Alternate Rates for Energy (CARE) program cycle. An amount equal to up to 4% of the Community Help and Awareness of Natural Gas and Electricity Services (CHANGES) pilot's annual budgets for years 2013, 2014, and 2015 is authorized for an evaluation provided by an independent evaluator, that amount may be modified by ruling of the assigned administrative law judge on good cause shown by the Consumer Service and Information Division (CSID). The evaluation will focus on two aspects: (1) the benefits and cost-effectiveness of services delivered to customers, including comparisons to similar initiatives nationwide, and (2) the extent to which customer-related information developed through the program is used effectively to inform CPUC programs and proceedings. The CPUC's Internal Audit Unit should assist CSID in the evaluation process as necessary. The evaluation of CHANGES should also consider whether in the areas served by small and multijurisdictional utilities (SMJU), CARE funding from the SMJU CARE budget should be provided to support CHANGES activities in those areas if funding for CHANGES has not been provided "On Budget" in those areas.

31. Once the Community Help and Awareness of Natural Gas and Electricity Services program transitions to an on-budget funding source, the evaluation and managerial improvement process described in Ordering Paragraph 31 will continue in the same manner, with the same staff division of responsibilities on an ongoing basis and with independent evaluations to be performed at least once every three program years.

32. Application (A.) 14-11-007, A.14-11-009, A.14-11-010, and A.14-11-011. remain open to complete the Decision in the consolidated California Alternate Rates for Energy and Energy Savings Assistance Program proceedings .

This order is effective today.

Dated _____, at San Francisco, California

ATTACHMENT A

2013

CHANGES Pilot Program Annual Report



Community Help and Awareness of Natural Gas and Electricity Services (CHANGES)



California Public Utilities
Commission

Consumer Service and
Information Division

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Executive Summary

The California Public Utilities Commission's (CPUC) Consumer Service and Information Division (CSID) is providing this report which documents activities provided through the CPUC Community Help and Awareness of Natural Gas and Electricity Services (CHANGES) pilot program. The report covers January 2013 through December 2013.

The CHANGES pilot provides limited English proficient (LEP) people with natural gas and electricity (energy) education and assistance in the language of the LEP person's choice. Services include education and assistance in understanding and managing energy bills. It includes assistance to help LEP people establish payment arrangements, or renegotiate payment arrangements which are more agreeable with their budgets. The pilot helps LEP people avoid disconnection, or assists them in reconnection of their service. It helps them sign up for consumer assistance programs and financial assistance, and helps them receive adjustments or corrections to their bills. These services are provided through a statewide network of community based organizations (CBOs).

The CHANGES pilot is modeled after a CPUC program which was created to assist California's significant LEP population to understand and resolve issues with telecommunications services and bills. According to the U.S. Census, more than six million, or 22 percent of California's adult population is LEP. The level of LEP people in California is likely to continue, since California remains a primary immigration destination. For the telecommunications program, the CPUC utilizes CBOs to assist LEP consumers. CBOs provide solid support because, through provision of vital services such as food, housing and employment, they have developed strong, positive relationships with the LEP communities they serve. Therefore, the LEP population has come to trust the CBOs.

While providing these services in selected locations throughout the state, the CHANGES pilot provides opportunity for the CPUC to collect data to demonstrate the level of demand for these services. The CPUC collects demographic data on the populations served, and whether those served fall within the income eligibility requirements for the California Alternate Rates for Energy Program (CARE) which is provided through the CPUC. The data collected is to be used to determine whether the CHANGES pilot should be made a permanent program, and if so, whether the services should be expanded to encompass all areas of California.

The pilot will also consider the funding level and funding source for an ongoing program, if adopted. The pilot is funded through CARE, as provided in the California Public Utilities Code,



Section 739.4 (b) (3) (attached), because most of the consumers to be assisted in this pilot are likely to have income levels that fall within CARE eligibility requirements. In fact, the CHANGES Needs and Dispute Resolution database notes that 94% of all of the clients assisted have been CARE eligible.

During the year 2013, 18 CBOs participated in the pilot¹ with the potential to communicate directly with consumers in 31 languages.² The CBOs involved in the pilot provide services to California's most vulnerable population, including seniors and people new to California who do not speak English or understand American culture. The services they provided (as of the writing of this report) are summarized below, and are detailed later in this report and in the attachments.

- ❖ **27 Languages** - Outreach, Education Workshops, and Needs and Dispute Resolutions were transacted in 27 languages. Caseworkers are able to directly communicate with the clients seeking their services.
- ❖ **1,773,186 Outreach Contacts** – Through attending community events, and enlisting print and broadcast media, the CBOs contacted clients to inform them of the existence of the CHANGES pilot at their respective CBOs.³
- ❖ **14,293 Educated** – CBOs held workshops to educate people on six different topics. CPUC staff observed that the events are so successful that more people remained afterwards to receive assistance, than the CBO staff could manage in the time allotted.
- ❖ **1,295 Cases with 2,902 Needs and Dispute Resolutions** –There were approximately 2.25 resolutions per case, meaning when a client came to a CBO with one concern, the caseworker took care of other matters as well. CSID noted that in the last six months of 2013, the CBOs helped clients receive \$20,491, mostly in financial assistance, but some from bill adjustments and lowered or waived deposits.⁴ For example, a Laotian-speaking couple came to a CBO seeking assistance with their bill. The caseworker helped them with the Home Energy Assistance Program (HEAP) application, cancelled the third party energy company because it was charging more than the utility, and explained Medical Baseline and the procedure for getting approval to be on the service.

¹ The list of the CBOs participating, and the general service area they covered, is attached.

² The list of the languages of which the CBOs provided services is attached.

³ This figure is based on the industry standard of each respective media's reported subscribership.

⁴ CSID has only tracked dollar amounts for the last six months; therefore, we assume that on a yearly basis the figure is likely to be higher.



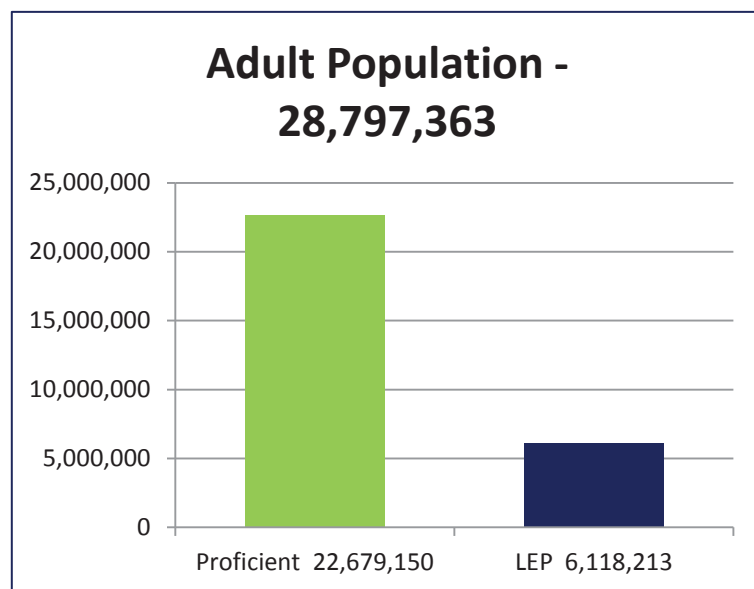
The report concludes that in 2013, the CBOs were successful in the provision of all of the services provided in the pilot. The report acknowledges that the CHANGES database should be enhanced if the pilot becomes an ongoing program. However to enable CSID to better evaluate the pilot, CSID reviewed all of the case notes for the Needs and Dispute Resolutions that occurred in 2013 and transferred that information to an Excel workbook which enabled CSID to store, sort and filter the data. The report mentions that an ongoing program, if adopted, should include generic collateral material with CHANGES' own branding. The report also provides data indicating that having CHANGES provided through the same CBOs involved in another similar CPUC program has benefitted consumers because they have been able to receive assistance from both programs at the same time.

Background

According to the 2012 U.S. Census Community Survey, more than six million, or 21 percent of California's adult residents, have limited proficiency in English.⁵

Nationwide, California has the highest LEP population and the highest immigrant population at 27%. According to a report issued by the University of Southern California Population Dynamics Research Group, "The foreign born share of the population is higher in California,

and the number larger, than any nation in the world with a population of 10 million or more..."⁶ California's high LEP population goes hand in hand with its immigrant population. California's tendency to have a high LEP population is likely to continue, since according to the U.S. Census report, California remains the primary destination for immigrants in the United States.



⁵ California's total population is 38,041,430. We are using statistics for the adult population because California has taken a stance that children should not be expected to interpret adult concepts for their parents.

⁶ Generational Projections of the California Population By Nativity and Year of Immigrant Arrival, p.13
http://www.usc.edu/schools/price/research/popdynamics/futures/2012_Pitkin-Myers_CA-Pop-Projections.pdf

Difficulty with understanding and communicating in English may create a barrier to learning about, and receiving the benefits of, consumer programs. To mitigate this, both state and federal requirements direct agencies, and recipients of funding for programs, to provide services in languages other than English.⁷ The CPUC, as well as the utilities it regulates, have taken measures to assist LEP consumers through bilingual staff, telephonic language centers and collateral material in several languages. However, these measures do not provide hands on, one-on-one assistance to LEP consumers who do not read English or, for an assortment of reasons, are too leery of government and large corporations to contact them for assistance.

That program is referred to as Telecommunications Education and Assistance in Multiple-languages (TEAM) and is managed by a contractor under the auspices of the CPUC's CSID. It provides Outreach, Education and Complaint Resolution services to LEP consumers through a statewide network of CBOs, which are subcontracted by the contractor. The Team program was created as a result of formal proceedings in which the CPUC ordered that, "We believe that we can improve our complaint resolution efforts by working more with CBOs, which possess unique insights into problems faced by specific communities."⁸In CPUC Decision D.07-07-043, Ordering Paragraph 13, staff was directed to "...design a program that integrates CBOs in the Commission's Outreach, Education and Complaint Resolution processes..." In CPUC Resolution CSID-002, the CPUC established the TEAM program to meet D.07-07-043's requirements.

The CPUC is relying on some of the CBOs in the TEAM program to also carry out the CHANGES pilot program because they speak the client's language, rather than relying on a computerized translator. CBO staff are often from the same countries as the communities they serve, enabling them to explain or translate issues with cultural sensitivity. In addition the CBOs utilized are often the organizations that have already helped LEP consumers with other issues, such as housing, food, job referrals and immigration requirements. For example, one CBO meets its clients as they first arrive in the United States, and helps them with their basic needs; provides food, shelter and in the days/weeks that ensue, the CBO helps them seek employment.

The CPUC determined it should adopt an energy-related pilot because since the beginning of the TEAM program, consumers who have visited CBOs for TEAM-related assistance have also requested help with energy issues and bills.⁹ As a result, CSID met with the four major investor owned utilities (IOUs), namely, Pacific Gas and Electric Company (PG&E), San Diego Gas and

⁷ Executive Order 1366 signed by President William Clinton in 2000 and California's Dymally-Alatorre Bilingual Services Act.

⁸ CPUC Decision D.06-03-013, p.101.

⁹ The TEAM contractor has stated this to CSID staff, several caseworkers involved in the TEAM program have stated this and CSID staff have experienced this request first hand while attending TEAM events.



Electric (SDG&E), Southern California Edison (SCE) and Southern California Gas Company (SCG), to discuss creating a pilot program, modeled after the TEAM program, to determine if the CPUC should adopt such a program to assist LEP consumers with natural gas and electricity services and bills. All of the IOUs were receptive to the endeavor and continue to assist CSID through funding the CHANGES pilot program, active participation in refinement of the program's data collection and reporting, and attendance at monthly meetings.

CPUC Resolution CSID-004, on November 19, 2010, approved a one year pilot program and set the funding for the year-long pilot at \$500,000 through the CARE Outreach budget. The CPUC determined that the pilot could be funded through CARE funds, as indicated in the California Public Utilities Code, Section 739.4 (b) (3), because the majority of the consumers to be assisted in this program were likely to have income levels that meet CARE eligibility requirements.¹⁰ The Resolution also determined that the pilot should evaluate whether an ongoing program, if adopted, should continue to be funded through CARE funds and if so, at what level.

The Resolution ordered that payment would be made by the IOUs using the same proportions as other joint funded programs, as follows:

- ✓ PG&E – 30%; \$150,000
- ✓ SDG&E – 15%; \$75,000
- ✓ SCE – 30%; \$150,000
- ✓ SCG – 25%; \$125,000

The pilot utilizes the same contractor as it does for the TEAM program. However, because it is currently only a pilot and the funds are limited, only about 55% of the TEAM CBOs are participating in the CHANGES pilot. The CPUC will also evaluate if an ongoing CHANGES program should be combined with the TEAM program to provide full utility assistance services to the same clients.

From November 19, 2010, through January 2011, CSID, the contractor and the IOUs developed the Scope of Work for the pilot and services began in February 2011.

In Resolution CSID-005, approved on November 10, 2011, CSID detailed the achievements of the pilot from February 2011 through September 2011, in compliance with CSID-004 which ordered CSID to recommend to the CPUC whether the pilot should continue. CSID reported

¹⁰ This was determined by looking at statistics generated from the database used for the TEAM program which showed that 80% of TEAM clients reported that their yearly income was less than \$25,000 in 2010. At that time, income qualification for CARE began at \$31,300, so it is likely that the percentage of people who were CARE recipients is higher. Additionally, many of the CBOs conducted Outreach or workshops for seniors (another consumer group noted in Section 739.4).



that despite a certain amount of lag time for a learning curve and for the pilot to produce results, the CBOs:

- ❖ Provided assistance in 17 languages.
- ❖ Helped more than 100 LEP clients apply for CARE and assisted hundreds more to apply for financial assistance.
- ❖ Educated 11,400 LEP clients about energy services and bills which helped them lower their energy usage, avoid disconnections and understand payment arrangements.
- ❖ Resolved 1,083 Needs and Disputes such as signing people up for financial assistance, negotiating payment arrangements and helping clients enroll in Energy Savings Assistance Programs.

CPUC Resolution CSID-005 determined that the pilot duration be extended to allow time for additional data collection and pilot evaluation, as well as time to review the appropriate CARE funding, if any. The Resolution also increased the funding level to no more than \$60,000 monthly, for the next portion of the pilot. The increase was ordered because some of the CBOs were so successful that they were turning clients away. The Resolution also directed that CSID, ED and an independent consultant should review 12 months of data to evaluate the pilot and the benefits of the pilot's use of CARE funds.

The resulting independent evaluation was accepted to the CARE proceeding (A.11-05-017) by a judge's ruling on November 6, 2012. The ensuing CPUC Decision D.12-12-011 stated that while the evaluation "lays some general foundation to confirm the need for the CHANGES Pilot Program for the California's LEP population,"¹¹ the evaluation did not provide sufficient review and analysis to determine if an ongoing program should be funded by CARE funds, whether wholly or partly. Therefore, the CPUC decision directed continued funding not to exceed \$60,000 per month for the pilot until the end of the 2012-2014 CARE program cycle, or until alternate or complimentary funding can be put in place, whichever came first. The decision also directed improvements to the pilot program success criteria and the pilot program tracking and reporting.

CSID, ED, the contractor, and the IOUs met regularly to develop the improvements. As a result the contractor enhanced the CHANGES database and its monthly reports. CSID, ED, the contractor and the IOUs created a working document detailing program components and their evaluation, and the IOUs developed two tables which became Tables 10 and 11 in their CARE monthly reports to the Commission.

¹¹ D.12-12-011, at p.10



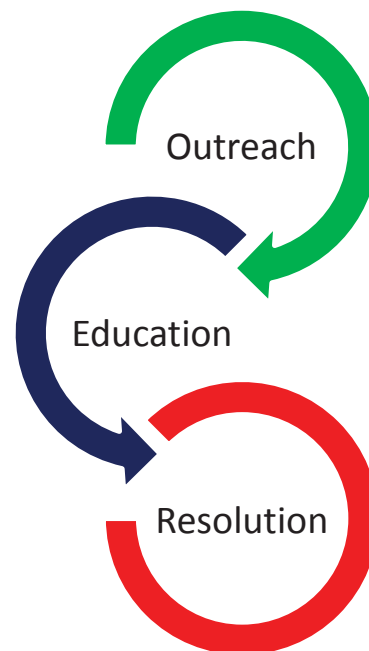
2013 CHANGES Activities

The CHANGES pilot contains four components which are interrelated (Outreach, Education, and Needs and Dispute Resolution). To assure that their constituents are provided with cultural sensitivity, the CBOs handle all four components with assistance from the contractor and lead staff, when necessary. This includes developing their own presentations, press releases, and interacting with the IOUs on behalf of the clients. Thus, the pilot provides a holistic approach to meeting Outreach, Education and Needs and Dispute Resolution requirements of the LEP population.

Outreach advises the public of the existence of the program and encourages them to seek the CBO's assistance.

Education provides awareness of utility services, issues and consumer assistance programs. Education encourages clients to bring their bills and speak to a caseworker for one-on-one assistance with securing needs or resolving disputes.

Needs and Dispute Resolution allows the client to discuss the concerns with the caseworker and the caseworker provides direct assistance tailored to the situation and when appropriate, advocates on behalf of the client. A situation is considered a "Need" if the client indicates he or she has not made contact with the IOU, or if it appears to the caseworker that the client can be assisted without contacting the IOU. A situation is considered a "Dispute" if the client indicates he or she has contacted the IOU but the issue was not resolved to the client's satisfaction.





❖ **1,773,186 Outreach Contacts in 2013**

- ✓ 1,609,800 consumers contacted through the media
- ✓ 163,386 consumers contacted through community events

The Outreach budget for the pilot is not sufficient to finance mass marketing. Additionally, marketing on a large, or even an average scale was not considered because the pilot is limited in size and did not want to attract more people than it can manage. Instead it was determined to use a simpler yet more direct approach of informing the public about the CHANGES pilot, by keeping Outreach within the local CBO community. The CBOs are compensated for attending two community events and two local media placements per year. However, the CBOs also promote the CHANGES services through signage at their CBO and other community locations, or through word of mouth.

CBO staff attends community events and tells clients, who approach their booth, about the services they can receive from the CBO. CBO staff may also contact print or broadcast media, utilizing interviews or press releases, to inform the community of the existence of CHANGES at their organizations.¹² The contacts are conducted in the language of the community (ies) that the CBO serves. The CBOs provide details and documentation to the contractor of how many people visited the CHANGES CBO table at events. If the Outreach was through media, the CBOs provide the contractor details pertaining to which media option they pursued, the particular media's subscribership and if print media, a copy of the news clips.

CBOs which have established CHANGES client bases are not required to conduct Outreach. Instead they may discuss a modification of their contract with the contractor, to enable the CBO to use the Outreach funds for Education, or Needs and Dispute Resolution.

Outreach is considered a success because clients have been attending the CHANGES Education Workshops and one-on-one assistance sessions (Needs and Dispute Resolution). To further measure the success of Outreach, the caseworkers ask the clients seeking help with Needs and Dispute Resolution, how they heard of the program. The caseworker records the clients'

¹² The media contact figure is based on each respective media's reported subscribership.

responses in the “Referral Source” field in the CHANGES Needs and Dispute Resolution database. Of those cases, 158 or 12% had heard of the CHANGES pilot through community events or through the media. The year to date referral source table is attached to this report.



❖ Workshops: 14,293 people attended in 2013

- ✓ Assistance programs
- ✓ Payment plans
- ✓ Explaining the bill
- ✓ Energy conservation
- ✓ Avoiding disconnection
- ✓ Safety

Education Workshops are where the caseworker provides information and engages the attendees to share their own experiences related to the subject. Most workshops are conducted at the CBO location, but often a caseworker will give a presentation at another organization or an adult school class such as English as a Second Language (ESL) class. The six workshop subjects are noted above. Workshop presentations and group discussions last at least 30 minutes. Afterwards, clients may arrange to visit the CBO for assistance, or when possible, receive immediate assistance, through the Needs and Dispute Resolution components.

Workshop success is measured by pre- and post-tests, where the caseworker asks a question or two about the issue before and after the workshop. Pre- and post-tests are conducted verbally and the contractor has indicated that the results have been positive. To further measure the success of the workshops, the caseworkers ask the clients who are seeking help with Needs and Dispute Resolution, how they heard of the program. The caseworker records the clients’ responses in the “Referral Source” field in the CHANGES Needs and Dispute Resolution

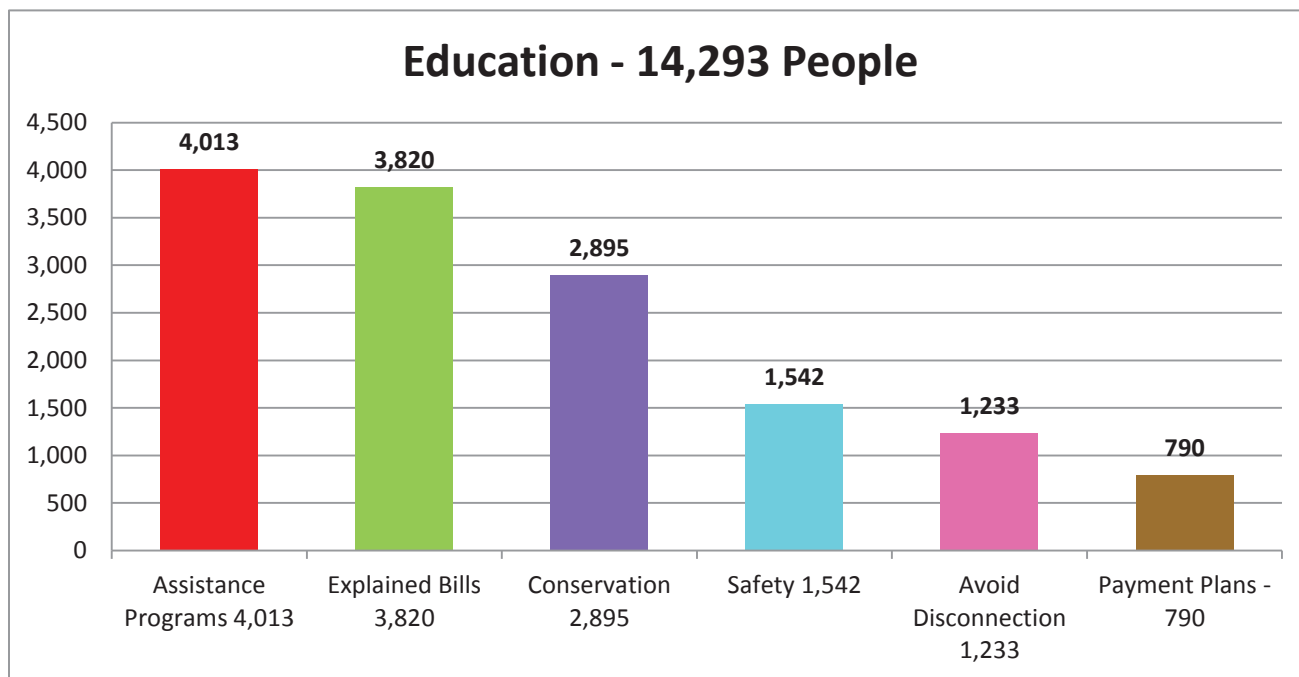


database. Of those cases, 398 or 31% had heard of the CHANGES pilot through educational workshops.

CSID has attended these CBO workshops and found the caseworkers to be well prepared and successful in engaging the attendees. The group discussions encourage attendees to discuss their particular situations in a positive, nonthreatening environment. Many people who attended had also brought their bills and were seeking assistance resolving them or managing payments.

During the Education Workshops, clients have asked for collateral material in their language. Currently the CBOs provide clients with the utilities CARE, Family Electric Rate Assistance (FERA) and Medical Baseline applications and, when available, they are provided in the client's language. However, if the pilot becomes a permanent program, it should have its own branding and collateral materials to hand out. CSID did not pursue this for the pilot because creating and securing translations of them could have taken longer than the initial duration of the pilot, and the translation costs would have been prohibitive for what was expected to be a one year pilot.

The chart below shows the attendance for each of the six subjects for 2013.





❖ 1,295 Total Needs and Dispute Resolution Cases in 2013 with 2,902 services

- ✓ 2.2 services per case
- ✓ \$20,491,000 secured for consumers

The Outreach and Education components both attract clients to seek the CBOs' help in resolving Needs and Disputes. Of note is that in 2013, 158 or 12% were referred because of Outreach about CHANGES, 398 or 31% were referred because of a CHANGES Education Workshop, and 133 or 10% were referred because the client had received assistance through the TEAM program. A table showing the referral sources is attached.

Generally, a situation is considered a "Need" if the client indicates he or she has not made contact with the IOU and needs help, or if it appears that the client can be assisted without contacting the IOU. A situation is considered a "Dispute" if the client indicates he or she has contacted the IOU but the issue was not resolved to the client's satisfaction. Both Needs and Disputes are recorded in the CHANGES database. Statistical data is provided in the monthly reports and to the IOUs in the table format they developed.¹³

The monthly reports show that in 2013, there were a total of 1,345 *resolved* Disputes and *resolved* Resolutions. When a caseworker completes helping a client, the caseworker designates the case as *resolved*. Later, the case is audited by the contractor's lead team and

¹³ The contractor completes basic information about the contact and the IOUs check their records and provide additional information, such as if the person is enrolled in CARE. To avoid duplicity, CARE enrollments are not compensated as part of the CHANGES program, since the IOUs already have a program (CARE Capitation) where they compensate CBOs to enroll customers in CARE. However, to provide "one stop shopping," for potential CARE recipients, the CHANGES CBOs are also included in the IOUs program.

when they have completed their review, the lead team marks the case as *closed*. CSID determined it would evaluate cases once they had reached their final phase (*closed*).¹⁴

Early in 2013, CSID was reviewing closed cases in the database and discovered the database was recording only one service per case. However, caseworker notes in the database showed that the caseworkers were providing more than one service.¹⁵ Unfortunately the database could not be changed to record more than one service without completely redesigning it, so CSID has reviewed the notes on all of the closed cases which were opened in 2013, and is tracking all of the services provided to better evaluate the services being provided.

There are 28 different services with which a client can be assisted through this process. However, to simplify this report, we have combined similar services into six categories as shown in the following table. We are also attaching a table that lists the 28 services and their corresponding statistics.

¹⁴ This explains the difference between the monthly report and CSID's figures (1,345 *resolved* Disputes and Needs compared to 1,295 *closed* Disputes and Needs cases).

¹⁵ For example, a category includes helping with payment arrangements to avoid disconnection, assisting with getting financial assistance, and assisting with enrollment in ESAP.

<u>Needs and Disputes Services Related to Each Category</u>					
Education	Assistance Programs	Avoiding Disconnection	Conservation	Manage Accounts	Schedule Service
Understanding a bill and Baseline	LIHEAP/HEAP	Consultation on avoiding disconnection	Consultation on Conservation	Sign up for third party notification	Request meter service or test
CARE/FERA	EAF	Set up/Change payment extension		Verified bill	Schedule service visit
Medical Baseline	ESAP	Set Up/Change payment plan		Set up account	Schedule energy audit
All Assistance programs	GAF	Add or Modify Level Pay plan		Change account	
	N2N	Stop disconnection		Bill adjustment	
	Medical Baseline	Restore Service		Demand Response enrollment	
	REACH	Waive/decrease deposit			

Key:

CARE – California Alternate Rates for Energy – discounted service for qualifying low-income customers.

EAF – Energy Assistance Fund – SCE financial assistance program.

ESAP – Energy Savings Assistance Program – no cost weatherization for low-income households.

FERA – Family Electric Rate Assistance – discounted service for families earning slightly more than CARE levels.

GAF – Gas Assistance Fund – SCG’s financial assistance program.

Level Payment Plan – a client is billed the same amount year round.

LIHEAP / HEAP – Low Income Home Energy Assistance Program / Home Energy Assistance Program – Federal programs that provide financial assistance (HEAP) and weatherization and counselling.

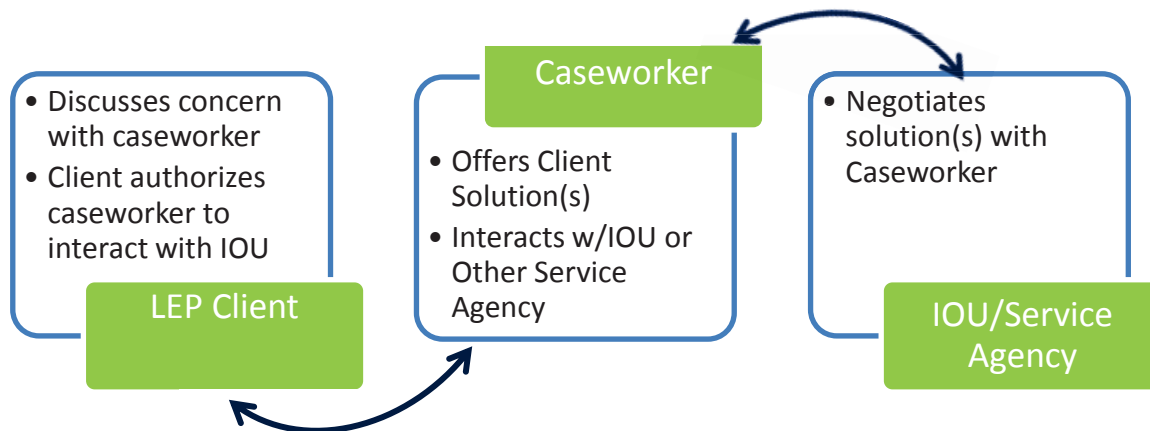
N2N – Neighbor to Neighbor – SDG&E’s financial assistance program.

Payment Extension – agreement to pay a bill on a specific date after the bill is due.

Payment Plan – arrangements to pay a bill in increments, such as \$50/month on an outstanding balance while keeping monthly bills paid in full.

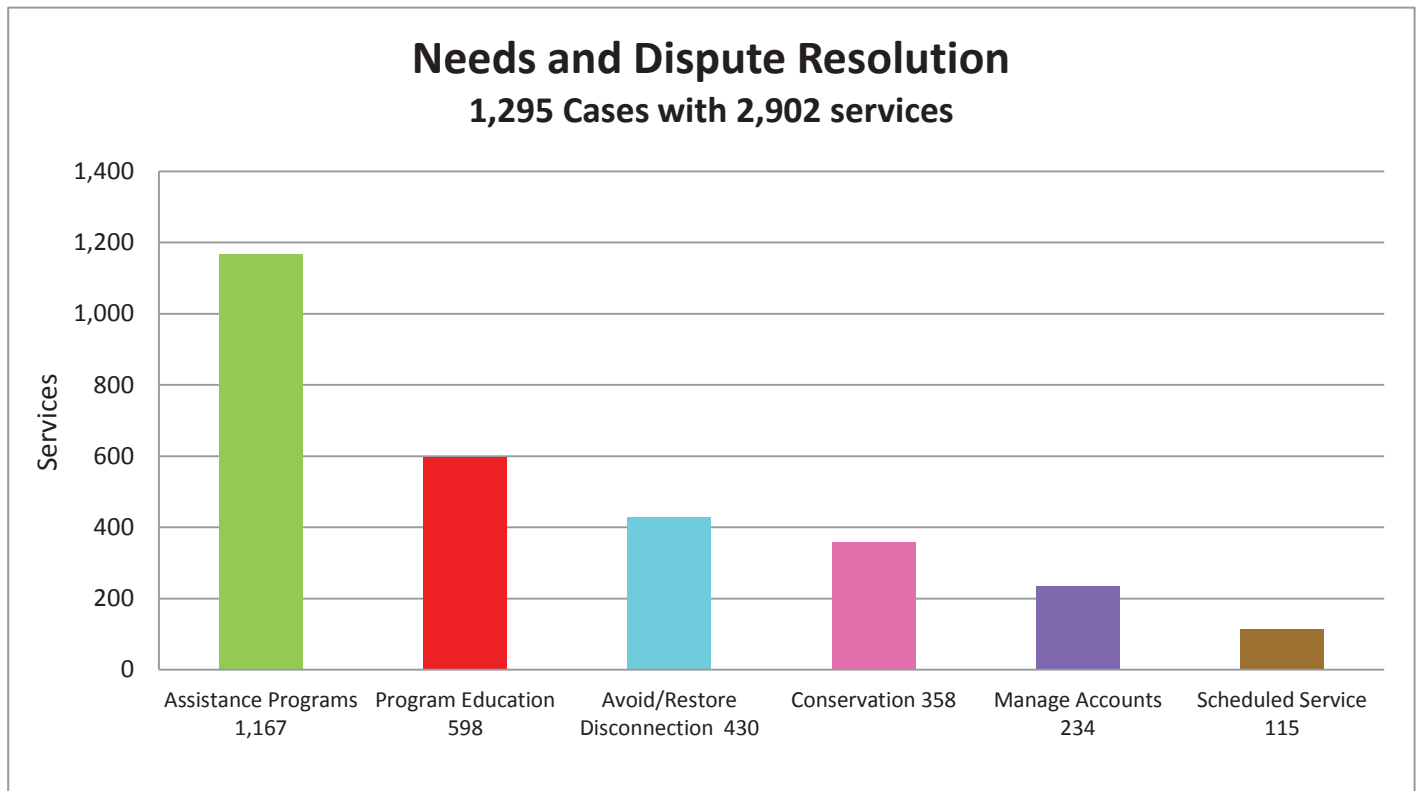
REACH – Relief for Energy Assistance through Community Help – PG&E’s financial assistance program.

Interactions Between Client, Caseworker, and IOU/Service Agency



In general, Needs and Disputes receive similar treatment from the caseworker. A client discusses concerns with the caseworker, one-on-one, and the caseworker determines if he or she should contact the IOU or another agency for assistance. Then the caseworker makes the appropriate contacts, continues to assist the client until the case is resolved, and notes the issue and the steps taken to resolve it in the database. For example, a client may meet with the caseworker with concerns that their energy service is going to be turned off because he or she cannot pay the bill. The caseworker may call a financial assistance agency to see if it can provide payment. If it can, the financial assistance agency will contact the IOU or just send in the payment. However, if the financial assistance agency will only be paying a portion of the bill, the caseworker will contact the IOU to negotiate payments arrangements suitable to the client. In one case the client's bill was nearly \$2,000. The Home Energy Assistance Program (HEAP) agreed to pay \$1,000, the Relief for Energy Assistance through Community Help (REACH) program paid \$200 and the CBO itself paid the balance of the bill. Attached are samples of typical cases handled in 2013.

In addition to the typical cases, CSID notes that there were several cases related to switching gas provision from the IOU to an outside company. In some cases, the switch was made upon request of someone in the home who was not the customer of record. In other instances the gas rates were not as low as the clients were led to believe. In resolving those cases the CBOs were successful in switching the clients back without them being charged the outside company's cancellation fee.



Needs and Disputes Successes

Based on several discussions with the contractor and the IOUs, CSID determined the following criteria would be used to measure success of the Needs and Disputes components of the program:

1. Assistance in the client's language.
2. Assistance with or education about consumer programs.
3. Assistance securing bill adjustments.
4. Assistance securing payment arrangements.
5. Assistance seeking financial assistance.
6. Assistance avoiding disconnections.

Upon reviewing the data, CSID has determined the following successes:

1. 1,295 clients receive assistance in 27 languages.
2. 754 clients were assisted with enrollment, or educated about, consumer programs (services numbered 2, 6, 9, 10, 12, 23 and 24 on the attached Services chart).
3. 14 clients received bill adjustments (service number 14 on the attached Services chart).

4. 188 clients received payment arrangements (services numbered 17, 18 and 28 on the attached Services chart).
5. 875 clients were assisted with financial assistance applications (services numbered 1, 2, 4, 5, and 27 on the attached Services chart).
6. 274 clients avoided disconnections, had service reconnected or were educated on how to avoid disconnection (services numbered 7, 19, 21 and 22 on the Services chart).

Languages

❖ Communicated in 27 languages in 2013

The CPUC and the IOUs have taken measures to assist consumers in their preferred languages. The IOUs employ bilingual staff in their customer service departments and the CPUC has certified¹⁶ several of its staff. When combined, the CPUC and IOU staff provides interpretation in 13 different languages.¹⁷ The CHANGES CBOs are able to communicate in 31 languages, as shown on the attached CBO list, both verbally and in writing. That is more than twice the amount of languages that the CPUC and IOUs collectively provide. Also, the CBOs take great care to ensure that the communications are made with cultural sensitivity, as analogies that may make sense to English speaking customers, may make no sense to someone from another country. For example, a generic flyer listing different consumer programs was provided to the CBOs and one of the caseworkers recognized that it used terms and jargon that have no similar meaning in her language, so she took great care in rewriting it and obtaining approval to use it.



¹⁶ California State workers must pass its language exam to become certified interpreters or translators.

¹⁷ According to the IOUs response to a data request, they collectively provide verbal assistance in English, Spanish, Mandarin, Cantonese, Vietnamese, Tagalog, Korean, and Cambodian. The CPUC provides assistance in most of those same languages plus has certified interpreters for Arabic, Armenian, Farsi, Italian, and Russian.

Both the IOUs and the CPUC contract with companies that provide language interpreters over the phone. However, those companies are directed to provide word for word interpretations and lack the training and experience that the CBOs have received on energy services and bills.

In reviewing the services the CHANGES pilot provides in language, CSID examined all the other state utility commissions' websites to determine if they provided other services that the CPUC should consider. CSID did not discover a product or service beyond what is already provided by the CPUC's bilingual services program, including its TEAM and CHANGES pilot programs. Staff also called the commissions that had the best consumer-related websites and discussed what interpretation/translation services they had. Several commissions have staff that speaks other languages, and they contract with companies for over-the-phone interpretation services. None of them enlist the help of CBOs to assist LEP consumers, although several of them indicated interest in the CPUC's TEAM and CHANGES pilot programs.

Funding

The CHANGES pilot has been funded through the CARE program, as provided in the California Public Utilities Code, Section 739.4 (b) (3). The CPUC approved use of CARE funds because when evaluating the TEAM program, which CHANGES is modeled after, the CPUC discovered that most of the consumers assisted in that program had income levels which qualified for the California LifeLine service. Qualifying income levels for California Lifeline are lower than CARE; therefore, it was a reasonable assumption that the same client type is eligible for CARE. In fact, the Needs and Disputes Resolution data shows that 94% of all of the clients assisted up through 2013 have been CARE eligible. It is reasonable to assume that CHANGES will continue to be low-income, since a significant amount of LEPs are immigrants and according to a study by the urban institute, "Immigrants' hourly wages are lower on average than those for natives, and nearly half earn less than 200 percent of the minimum wage - versus one-third of native workers."¹⁸

Initially the pilot was funded at \$500,000 a year (or \$41,667 a month). Payment to the contractor was provided directly by the IOUs at levels consistent with earlier CPUC decisions related to joint IOU funding. That was:

¹⁸ Immigrant Families and Workers, brief 4, p.1



- ✓ PG&E – 30%; \$150,000
- ✓ SDG&E – 15%; \$75,000
- ✓ SCE – 30%; \$150,000
- ✓ SCG – 25%; \$125,000

In the first year, the CBOs were so successful in providing services that the funds did not last the entire year and some clients in need of services were turned away. In the second year, funding was increased up to \$60,000 a month and kept the IOUs' contribution percentages the same. The CHANGES pilot has remained within that new budget; however, the pilot has limited statewide coverage. If the program becomes a permanent ongoing program, the program and related funding should be expanded to bring more CBOs into the program, allowing for better statewide coverage.

Findings

After reviewing the CHANGES pilot activities for the 2013 calendar year, CSID finds (by category):

1. Outreach: Outreach generated interest in the program. This is determined by good attendance at Education Workshops and indications in the CHANGES Needs and Dispute Resolution database that clients had learned of the service through an assortment of Outreach approaches.
2. Education Workshops: Attendees were attentive and engaged. Pre-and post-tests indicated attendees gained knowledge. The issues discussed are important to CARE eligible clients because they helped people keep their bills as low as possible. They encouraged people to enroll in services like CARE, FERA, ESAP, LIHEAP, Medical Baseline, and assisted in securing financial assistance when necessary. Workshops taught them how to avoid disconnection, including prompt payment of bills, level payment plans, payment arrangements, and payment extensions. The one workshop that does not directly help them keep service on, relates to safety. Safety is a priority at the CPUC and with the IOUs, so we will continue this workshop as an important component to Education.
3. Needs and Dispute Resolution: Clients were assisted to enroll in consumer programs, avoid disconnection, secure financial assistance, receive bill adjustments and to turn on,

CSID CHANGES 2013 Annual Report

or restore, service. Even in instances where the client could not be helped, the one-on-one session often increased the client's awareness of energy services and bills, and is likely to aide them in the future.

Attachments

- ❖ Public Utilities Code, Section 739.4
- ❖ List of CBOs
- ❖ List of Languages
- ❖ Referral Source
- ❖ Lists of Services Provided
- ❖ Case Samples

CALIFORNIA PUBLIC UTILITIES CODE, SECTION 739.4 (B) (3)

739.4.

(a) Any natural gas customer who enrolls in the CARE program after the effective date of this section, but before October 1, 2001, shall receive the same one-time bill credit based on the amount of each gas corporation's average CARE customer discount applied for each month in October 2000 to March 2001, inclusive. The credit does not apply to a customer who initiates service with a gas corporation after the effective date of this section, and who has no prior history of service with the gas corporation. CARE program funds shall be used for the purpose of providing these credits. The commission shall adjust CARE program income requirements annually to reflect the increased cost-of-living due to inflation.

(b) The commission shall require all electrical and gas utilities through which CARE program rates are available to do all of the following, in multilingual formats to the extent printed and recorded information is provided, to facilitate better penetration rates for the CARE program and to protect low-income and senior households from unwarranted disconnection of necessary electric and gas services:

(1) Provide an outgoing message on all calls, where the customer is seeking to establish service or is put on hold, to customer service lines that briefly describes the CARE program in standard language approved by the commission, and that provides a toll-free phone number for customers to call to subscribe to the program or for further information.

(2) Provide information to customers about the CARE program and facilitate subscription to CARE, on all calls in which customers are making payment arrangements, on all collections calls, and on all calls for reconnection of service.

(3) (A) Provide information about the CARE program and other assistance programs, and attempt to qualify customers for CARE, and provide information about individual payment arrangements that allow customers to pay the amounts due over a reasonable period of time, not to exceed 12 months, and attempt to enroll customers in a payment arrangement program, before effecting any disconnection of service for nonpayment or inability to pay energy bills in full.

CHANGES PILOT CBO LIST	
PG&E	
Asian Community Center (ACC Park City)	
Languages: Cantonese, Hmong, Korean	
Central California Legal Services, Inc.	
Languages: Spanish	
El Concilio of San Mateo County	
Languages: Spanish	
Lao Khmu Association, Inc.	
Languages: Cambodian, Cantonese, Hmong, Laotian, Mandarin, Vietnamese	
Self-Help for the Elderly	
Languages: Cantonese, Mandarin, Russian, Spanish, Tagalog, Taiwanese, Toisanese, Vietnamese	
Southeast Asian Community Center	
Languages: Cantonese, Mandarin, Vietnamese	
Suscol Intertribal Council	
Languages: Native American English, Spanish	
San Diego Gas & Electric Company	
Casa Familiar	
Languages: English, Spanish	
Alliance for African Assistance	
Languages: Arabic, Spanish, Karen	
Southern California Edison & Southern California Gas Company	
Asian American Educational & Cultural Center, Inc.	
Languages: Cambodian, Cantonese, Hmong, Indonesian, Japanese, Korean, Laotian, Mandarin, Sign Language, Spanish, Tagalog, Thai, Vietnamese	
Vietnamese Community of Orange County, Inc.	
Languages: Vietnamese	
Campaign for Social Justice	
Languages: Arabic, Armenian, Bosnian, Croatian, Dari, Farsi, Korean, Pashto, Persian, Russian, Spanish, Urdu	

Chinatown Service Center
Languages: Cantonese, Korean, Mandarin, Spanish, Toisanese
Delhi Center
Languages: Spanish
International Institute of Los Angeles
Languages: Cantonese, Farsi, Spanish, Vietnamese
Koreatown Youth & Community Center
Languages: Korean, Spanish
Little Tokyo Service Center
Languages: Chinese, Japanese, Korean, Spanish, Thai
People CORE's
Languages: Cambodian, Cebuano, Chinese, Ilokano, Korean, Spanish, Tagalog, Vietnamese
Pilipino Workers Center
Languages: Tagalog

CHANGES PILOT REFERRAL SOURCES	
Referral Source	Total Y-T-D
Consumer Participates in Another Program at the CBO	340
Consumer was in a CHANGES Educational Workshop	398
Consumer Received TEAM Services	133
Consumer Received Program Information at a Community Event	88
Consumer Learned of the Program through Newspaper, Radio, or Television	71
Consumer was Referred by Friend or Family	265
Consumer was Referred by Another CBO	74
Unknown	84

CHANGES PILOT 2013 LANGUAGES <i>Consumer Education, Needs, and Disputes</i>				
Language	Education Y-T-D	Needs Assistance Y-T-D	Disputes Y-T-D	Total Y-T-D
Arabic	375	45	7	427
Armenian	10	1	0	11
Burmese	1	0	1	2
Cantonese	1,408	211	23	1,642
Cebuano	0	1	0	1
Dari	41	0	0	41
English	1,074	249	30	1,353
English (Native American)	450	0	0	450
Farsi	34	2	0	36
Fijian	4	0	0	4
French	2	0	0	2
Hindi	4	2	0	6
Hmong	44	5	3	52
Indonesian	39	4	0	43
Japanese	197	1	0	198
Karen	10	6	0	16
Khmer	163	29	13	205
Korean	622	13	5	640
Laotian	132	12	10	154
Mandarin	391	15	1	407
Mien	63	0	0	63
Punjabi	2	0	0	2
Romanian	1	0	0	1
Russian	26	0	0	26
Spanish	4,416	309	113	4,838
Tagalog	1,260	17	5	1,282
Vietnamese	996	201	9	1,206
Total	11,765¹⁹	1,123	220	13,108

¹⁹ This amount of people is lower than what is shown under the Education section because, in some instances, more than one workshop session was provided to the same group of people.

CHANGES PILOT SERVICES BREAKDOWN	
1. HEAP/LIHEAP Application Assistance	594
2. Energy Assistance Fund Application	75
3. ESAP Application Assistance	175
4. Gas Assistance Fund Application Assistance	158
5. N2N Application Assistance	42
6. Medical Baseline Application Assistance	37
7. Educated on avoiding disconnection	164
8. Educated on how to read the bill	171
9. Educated on CARE/FERA	84
10. Educated on Medical Baseline	69
11. Educated on Energy Efficiency/ Conservation	358
12. Educated on all energy assistance programs	354
13. Request Meter Service or Testing	42
14. Bill Adjustment	8
15. Scheduled Customer Service Visit	15
16. Scheduled Energy Audit	58
17. Set Up/Change Payment Extension	36
18. Set Up/Change Payment Plan	117
19. Stop Disconnection	97
20. Verified Bill	79
21. Waive/Decrease Deposit	2
22. Restore Service	11
23. Sign up for 3rd Party Notification	32
24. Enrolled in Demand Response Programs (electricity)	3
25. Set Up Account	16
26. Changes to Account	96
27. REACH Application Assistance	6
28. Add or Modify Level Pay Plan	3
Total Resolutions	2902

CHANGES PILOT CLOSED CASES IN 2013

CASE	LANGUAGE	CASE NOTES
CASE 1	SPANISH	Client was five months behind on her gas bill and was the only person working in the household. Her husband had an identity theft issue; therefore, was unable to collect unemployment money. She feared getting a disconnection very soon. The utility was able to provide an extension for the total amount of \$142.43 and advised the client to make a payment now and then call back to make a new payment arrangement. CBO also referred the client to LIHEAP and after the struggle the client was satisfied with the assistance.
CASE 2	TAGALOG	Customer informed us that she was experiencing financial difficulties because of her husband recently being diagnosed with cancer. She was really concerned on how she would pay her bills on time, so we asked if she wanted to do a payment extension. She agreed that would be best because she was scared to be disconnected especially with her husband's delicate condition. Called the CHANGES assigned line and did a payment extension for the customer for 3/17/13 - a total of \$61.49 will be due. This will help ease the financial stress on the customer during her husband's medical visits.
CASE 3	ARABIC	Client, a refugee from Afghanistan that our agency helped resettle in San Diego this month needed help opening his SDGE account due to his lack of English and understanding about SDGE. One of our case managers was able to help him open his account and he was very happy and thankful for the help and he wouldn't have been able to do it without our help.
CASE 4	LOATIAN	Client and her husband are elderly and do not speak any English. They are on Social Security and do not get help from anyone. Client is already on the CARE program, but is seeking assistance with the HEAP application. I went ahead and started the HEAP application for the client and also made a call to the core transport agent (CTA) to cancel the services, because client is paying more with the CTA and they didn't know what they were signing up for when representatives visited their house. I also explained medical baseline and gave them paper work for their doctor to sign. Client and her husband were very happy that they came to us for help.

- | | | |
|----------------|-----------|--|
| CASE 5 | SPANISH | Client was interested in exchanging her refrigerator for a new one which the SoCal Edison program provides. After research from the CBO he stated she did not qualify since her refrigerator had to be over 15 years old and she had to be part of the CARE program as well. |
| CASE 6 | SPANISH | CBO helped the utility set up a plan to pay \$17.87 each month during 6 months plus the new charge of each month. The client agreed with payment plan. The client already has CARE program, I also sent her to LIHEAP where they could help her pay her bill. Client was happy with the payment arrangements that had been made; she thanked me for the help. Client was relieved her service was not going to be disconnected, and happy with the payment arrangements. |
| CASE 7 | ENGLISH | The client was afraid of service disconnection and explained financial hardships taking place at home. The client needed assistance with the HEAP Application and the CBO was also able to enter information for the CARE enrollment. The CBO gave energy saving tips and safety tips as well. |
| CASE 8 | ENGLISH | Client came into our office with his friend who just did her HEAP application for him. The CBO was able to assist with both the HEAP application and CARE since he is a single father having financial struggles. |
| CASE 9 | ENGLISH | Client complained about being over charged on her PG&E bill. After some research the CBO found out that she had a third party biller from a CTA. CBO encouraged the client to close the third party account and assisted with the HEAP application. They also educated the client about her payment arrangement and the current amount due. Client was very satisfied with my help and will refer others to get assistance. |
| CASE 10 | CAMBODIAN | Client and his wife were seeking some help with the HEAP application. They speak very limited English, and the male is the only one working at their household, but not taking home much. They are having trouble paying their bills. The CBO filed a HEAP application and educated on assistance programs. They also called the third party biller to cancel services, which was charging the client more. The client and his wife were very happy, that they came in for help. |

ATTACHMENT B

2014

CHANGES Pilot Program Annual Report



Community Help and Awareness of Natural Gas and Electricity Services (CHANGES)



California Public Utilities
Commission

Consumer Service and
Information Division

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Executive Summary

The California Public Utilities Commission's (CPUC or Commission) Consumer Service and Information Division (CSID) is providing this report, which documents activities provided through the CPUC Community Help and Awareness of Natural Gas and Electricity Services (CHANGES) pilot program. The report covers January 2014 through December 2014.

The CHANGES pilot provides limited English proficient (LEP) people with natural gas and electricity (energy) education and assistance in the language of the LEP person's choice. Services include education and assistance in understanding and managing energy bills. It includes assistance to help LEP people establish payment arrangements or renegotiate payment arrangements, which are more agreeable with their budgets. The pilot helps LEP people avoid disconnection or assists them in reconnection of their service. It helps them sign up for consumer assistance programs and financial assistance, and helps them receive adjustments or corrections to their bills. These services are provided through a statewide network of community based organizations (CBOs).

The CHANGES pilot is modeled after a CPUC program, which was created to assist California's significant LEP population in understanding and resolving issues with telecommunications services and bills. According to the 2010 U.S. Census decennial data, more than six million, or 21 percent of California's adult population, is LEP. The level of LEP people in California is likely to continue, since California remains a primary immigration destination. For the telecommunications program, the CPUC utilizes CBOs to assist LEP consumers. CBOs provided solid support because, through provision of vital services, they had already developed strong, positive relationships with the LEP communities they serve. Therefore, the LEP population has come to trust the CBOs.

While providing these services in selected locations throughout the state, the CHANGES pilot provides opportunity for the CPUC to collect data to demonstrate the level of demand for these services. The CPUC collects demographic data on the populations served, and whether those served fall within the income eligibility requirements for the California Alternate Rates for Energy Program (CARE), which is provided through the CPUC. The data collected is to be used to determine whether the CHANGES pilot should be made a permanent program, and if so, whether the services should be expanded to encompass all areas of California.

The pilot will also consider the funding level and funding source for an ongoing program, if adopted. The pilot is funded through CARE, as provided in the California Public Utilities Code,



Section 739.4 (b) (3) (Attachment A), because most of the consumers to be assisted in this pilot are likely to have income levels that fall within CARE eligibility requirements. In fact, the CHANGES Needs and Dispute Resolution database notes that 94% of all of the clients assisted up through 2014 have been CARE eligible.

During the year 2014, activity increased among the 19 CBOs participating in the pilot.¹ The increase may be attributed to increased awareness of the program. The pilot's flexibility, enabling it to add services to meet current demand, may also have contributed. In 2014, two issues emerged affecting the CHANGES clients: increased selling of Core Transport Agent (CTA) service (where consumers may purchase natural gas from a party other than the IOU) and CARE High Use requirements (CARE clients whose usage exceeds 400 percent of their monthly baseline allowance). In response to these issues, CHANGES began assisting consumers with the addition of education workshops and with Need or Dispute Resolution. The services the CBOs provided in 2014 are summarized below, are detailed later in this report and are included in the attachments.

- ❖ **44 Languages** – Outreach, Education Workshops, and Needs and Dispute Resolutions were transacted in 44 languages, an increase of 16 languages from 2013. Caseworkers are able to directly communicate with the clients seeking their services.
- ❖ **3,334,175 Outreach Contacts** – Through attending community events, and enlisting print and broadcast media in languages other than English, the CBOs promoted the existence of the CHANGES pilot at their respective CBOs.² This is an increase of 1,560,989 contacts compared to 2013.
- ❖ **24,882 Consumers Educated** – CBOs held workshops to educate people on eight different topics. This is an increase of two workshops, and 10,589 more people educated than 2013.
- ❖ **1,473 Cases with 2,821 Needs and Dispute Resolutions** – This is 178 more cases than 2013. There were approximately 1.92 resolutions per case, meaning when a client came to a CBO with one concern, the caseworker took care of other matters as well. For example, a Spanish-speaking client came to a CBO seeking assistance with their bill. The caseworker helped her with the Home Energy Assistance Program (HEAP) application to secure an initial payment on the account, helped her

¹ Attachment C provides the list of the CBOs participating and the general service area they covered.

² This figure is based on each respective media's reported subscribership.



set up a payment plan, and gave her tips on how to conserve energy to lower future bills.

- ❖ **\$50,152 provided to consumers** – This figure was not tracked the first six months of 2013, but for the last six months that year, the funds totaled \$20,491. This figure includes adjustments to bills, waiving or lowering deposits, and financial assistance. There are federal, state, and some local government programs, which have specific funds to provide payments to investor owned utilities (IOUs) to help qualified applicants maintain utility services. Some nonprofits provide the same services, and each of the four major IOUs raise funds annually (through voluntary donations) to provide the same assistance.

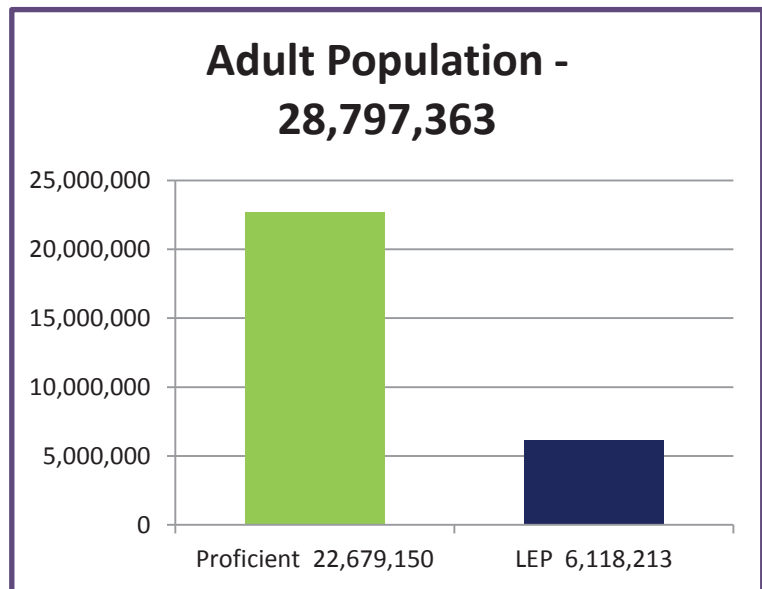
This report concludes that in 2014, the CHANGES pilot was successful in the provision of its services to its client base. This is demonstrated through increased use of the service, the complexity of certain cases the CBOs resolved, the pilot's ability to change or increase its education and dispute components as situations arise, and the plethora of languages in which services are provided.



Background

According to the 2010 U.S. Census, more than six million, or 21 percent of California's adult residents, have limited proficiency in English.³ Nationwide, California has the highest LEP population and the highest immigrant population at 27 percent. According to a report issued by the University of Southern California Population Dynamics Research Group, "The foreign born share of the population is higher in California, and the number larger, than any nation in the world with a

population of 10 million or more..."⁴ California's high LEP population goes hand in hand with its immigrant population. California's tendency to have a high LEP population is likely to continue, since according to the U.S. Census report, California remains the primary destination for immigrants in the United States.



Difficulty with understanding and communicating in English may create a barrier to learning about, and receiving the benefits of, consumer programs. To mitigate this, both state and federal requirements direct agencies and recipients of funding for programs to provide services in languages other than English.⁵ The CPUC, as well as the utilities it regulates, have taken measures to assist LEP consumers through bilingual staff, telephonic language centers, and collateral material in several languages. However, these measures do not provide hands on, one-on-one assistance to LEP consumers who do not read English or, for an assortment of reasons, are untrusting of government and large corporations to contact them for assistance.

³ California's total population is 38,041,430. We are using statistics for the adult population because California has taken a stance that children should not be expected to interpret adult concepts for their parents.

⁴ Generational Projections of the California Population By Nativity and Year of Immigrant Arrival, p.13
http://www.usc.edu/schools/price/research/popdynamics/futures/2012_Pitkin-Myers_CA-Pop-Projections.pdf

⁵ Executive Order 1366 signed by President William Clinton in 2000 and California's Dymally-Alatorre Bilingual Services Act.



In developing the CHANGES pilot, the CPUC determined it would model the pilot after an existing CPUC program that assists LEP consumers on telecommunications services and issues. That program is referred to as Telecommunications Education and Assistance in Multiple-languages (TEAM) and is managed by a contractor under the auspices of the CPUC's CSID. It provides Outreach, Education, and Complaint Resolution services to LEP consumers through a statewide network of CBOs, which are subcontracted by the contractor. The TEAM program was created as a result of formal proceedings in which the CPUC ordered that, "We believe that we can improve our complaint resolution efforts by working more with CBOs, which possess unique insights into problems faced by specific communities."⁶ In CPUC Decision D.07-07-043, Ordering Paragraph 13, staff was directed to "...design a program that integrates CBOs in the Commission's Outreach, Education, and Complaint Resolution processes..." In CPUC Resolution CSID-002, the CPUC established the TEAM program to meet the requirements in D.07-07-043.

The CPUC is relying on some of the CBOs in the TEAM program to also carry out the CHANGES pilot program because they speak the client's language, rather than relying on a computerized translator. CBO staff are often from the same countries as the communities they serve, enabling them to explain or translate issues with cultural sensitivity. In addition, the CBOs utilized are often the organizations that have already helped LEP consumers with other issues, such as housing, food, job referrals, and immigration requirements. For example, one CBO meets its clients as they first arrive in the United States and helps them with their basic needs; provides food, shelter, and in the days/weeks that ensue, the CBO helps them seek employment.

The CPUC determined it should adopt an energy-related pilot because since the beginning of the TEAM program, consumers who have visited CBOs for TEAM-related assistance have also requested help with energy issues and bills.⁷ As a result, CSID met with the four major IOUs, namely, Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric (SDG&E), Southern California Edison (SCE), and Southern California Gas Company (SCG), to discuss creating a pilot program modeled after the TEAM program, to assist LEP consumers with natural gas and electricity services and bills. All of the IOUs were receptive to the endeavor and continue to assist CSID through active participation in refinement of the program's data collection and reporting, and attendance at monthly meetings.

CSID discussed funding for the pilot with then Commissioner Dian Gruenich's staff, Energy Division (ED) staff, and the Administrative Law Judge (judge) assigned to the CARE proceeding.

⁶ CPUC Decision D.06-03-013, p.101.

⁷ The TEAM contractor has stated this to CSID staff, several caseworkers involved in the TEAM program have stated this and CSID staff have experienced this request first hand while attending TEAM events.



It was determined that the pilot could be funded through CARE funds, as indicated in the California Public Utilities Code, Section 739.4 (b) (3), because the majority of the consumers to be assisted in this program were likely to have income levels that meet CARE eligibility requirements.⁸ It was also agreed that the pilot should evaluate whether an ongoing program, if adopted, should continue to be funded through CARE funds and if so, at what level.

As a result of the discussions, CSID drafted CSID-004 for CPUC consideration, and on November 19, 2010, the CPUC approved a one year pilot program. CSID-004 also set the funding for the year-long pilot at \$500,000 through the CARE Outreach budget. Payment would be made by the IOUs using the same proportions as other jointly funded programs as follows:

- ✓ PG&E – 30%; \$150,000
- ✓ SDG&E – 15%; \$75,000
- ✓ SCE – 30%; \$150,000
- ✓ SCG – 25%; \$125,000

The pilot utilizes the same contractor as it does for the TEAM program. However, because it is only a pilot and the funds are limited, only about 56 percent of the TEAM CBOs are participating in the CHANGES pilot. The CPUC will also evaluate if an ongoing CHANGES program should be combined with the TEAM program to provide full utility assistance services to the same clients.

From November 19, 2010 through January 2011, CSID, the contractor, and the IOUs developed the Scope of Work for the pilot and services began in February 2011.

In Resolution CSID-005, approved on November 10, 2011, CSID detailed the achievements of the pilot from February 2011 through September 2011 in compliance with CSID-004, which ordered CSID to recommend to the CPUC whether the pilot should continue. CSID reported that despite a certain amount of lag time due to a learning curve and for the pilot to produce results, the CBOs:

- ❖ Provided assistance in 17 languages.
- ❖ Helped more than 100 LEP clients apply for CARE, and assisted hundreds more to apply for financial assistance.

⁸ This was determined by looking at statistics generated from the database used for the TEAM program, which showed that 80% of TEAM clients reported that their yearly income was less than \$25,000 in 2010. At that time, income qualification for CARE began at \$31,300, so it is likely that the percentage of people who were CARE recipients is higher. Additionally, many of the CBOs conducted Outreach or workshops for seniors (another consumer group noted in Section 739.4).



- ❖ Educated 11,400 LEP clients about energy services and bills, which helped them lower their energy usage, avoid disconnections, and understand payment arrangements.
- ❖ Resolved 1,083 Needs and Disputes, such as signing people up for financial assistance, negotiating payment arrangements, and helping clients enroll in Energy Savings Assistance Programs.

CSID recommended that the pilot duration be extended to allow time for additional data collection and pilot evaluation, as well as time to review the appropriate CARE funding, if any. The Resolution also increased the funding level to no more than \$60,000 monthly for the next portion of the pilot. The increase was ordered because some of the CBOs were so successful that they were turning clients away. The Resolution also directed that CSID, ED, and an independent consultant review 12 months of data to evaluate the pilot and the benefits of the pilot's use of CARE funds.

The resulting independent evaluation was provided to CSID, ED, and the judge assigned to the CARE proceeding. While the evaluation laid some general foundation to confirm the need for the program, it did not provide sufficient review and analysis to determine if an ongoing program should be funded by CARE funds, whether wholly or partly. In CPUC Decision D.12-12-011, which was issued on December 26, 2012, the CPUC extended the pilot again, at the same funding level, until the end of the 2012-2014 CARE program cycle, or until alternate or complimentary funding can be put in place, whichever came first. The decision also directed improvements to the pilot's tracking, reporting, and program success criteria.

CSID, ED, the contractor, and the IOUs met regularly to develop the improvements. As a result, the contractor enhanced the CHANGES database and its monthly reports. CSID, ED, the contractor, and the IOUs created a working document detailing program components and their evaluation, and the IOUs developed two tables which became Tables 10 and 11 in their CARE monthly reports to the Commission.

The CARE proceeding for program years 2012-2014 concluded in 2014, prior to the Commission completing its review of CHANGES. Therefore in Decision D. 14-08-030, the Commission extended the pilot through calendar year 2015 and increased its funding to \$61,200 monthly to account for the cost of living.



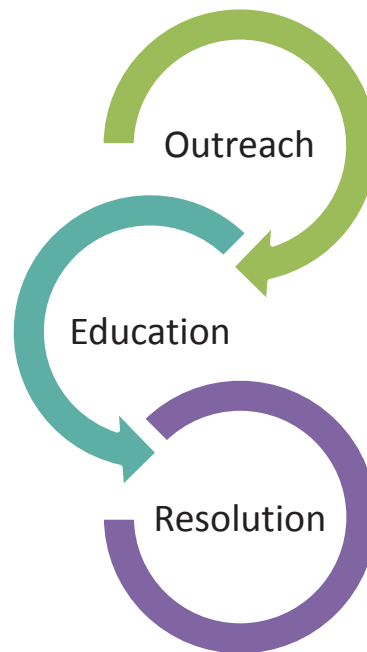
2014 CHANGES Activities

The CHANGES pilot contains three components that are interrelated (Outreach, Education, and Needs and Dispute Resolution). To assure that their constituents are provided with cultural sensitivity, the CBOs handle all four components with assistance from the contractor and lead staff, when necessary. This includes developing their own presentations, press releases, and interacting with the IOUs on behalf of the clients. Thus, the pilot provides a holistic approach to meeting Outreach, Education, and Needs and Dispute Resolution requirements of the LEP population.

Outreach advises the public of the existence of the program and encourages them to seek the CBO's assistance.

Education provides awareness of utility services, issues, and consumer assistance programs. Education encourages clients to bring their bills and speak to a caseworker for one-on-one assistance with securing needs or resolving disputes.

Needs and Dispute Resolution allows the client to discuss the concerns with the caseworker, who provides direct assistance tailored to the situation and when appropriate, advocates on behalf of the client. A situation is considered a "Need" if the client indicates he or she has not made contact with the IOU, or if it appears to the caseworker that the client can be assisted without contacting the IOU. A situation is considered a "Dispute" if the client indicates he or she has contacted the IOU but the issue was not resolved to the client's satisfaction.





❖ **3,334,175 Outreach Contacts, an increase of 1,560,989 from 2013**

- ✓ 3,238,365 consumers contacted through the media
- ✓ 95,810 consumers contacted through community events

The Outreach budget for the pilot is not sufficient to finance mass marketing. Additionally, marketing on a large, or even an average, scale was not considered because the pilot is limited in size and was careful to avoid attracting more people than it can assist. Instead, it was determined that CHANGES would use a simpler yet more direct approach of informing the public about the pilot by keeping Outreach within the local CBO community. The CBOs are compensated for attending two community events and two local media placements per year. However, the CBOs also promote the CHANGES services through signage at their CBO and other community locations, by contacting community leaders, such as elected officials, and also through word of mouth.

CBO staff attends community events and tells clients, who approach their booth, about the services they can receive from the CBO. CBO staff may also contact print or broadcast media, utilizing interviews or press releases, to inform the community of the existence of CHANGES at their organizations.⁹ The contacts are conducted in the language of the community(ies) that the CBO serves. The CBOs provide details and documentation to the contractor of how many people visited the CHANGES CBO table at events. If the Outreach was through media, the CBOs provide the contractor details pertaining to which media option they pursued, the particular media's subscribership, and if print media, a copy of the news clips.

CBOs which have established CHANGES client bases are not required to conduct Outreach. Instead, they may discuss a modification of their contract with the contractor to enable the CBO to use the Outreach funds for Education or Needs and Dispute Resolution.

Outreach is considered a success because clients have been attending the CHANGES Education Workshops and one-on-one assistance sessions (Needs and Dispute Resolution). To further measure the success of Outreach, the caseworkers ask the clients seeking help with Needs and

⁹ The media contact figure is based on each respective media's reported subscribership.



Dispute Resolution, how they heard of the program. The caseworker records the clients' responses in the "Referral Source" field in the CHANGES Needs and Dispute Resolution database. Of the Needs and Dispute Resolution cases, 299 or 18 percent had heard of the CHANGES pilot through community events or through the media. The year-to-date referral source table is included as Attachment D in this report.



- ❖ Workshops: 24,882 people attended, an increase of 10,589 from 2013
 - ✓ Assistance programs
 - ✓ Payment plans
 - ✓ Explaining the bill
 - ✓ Energy conservation
 - ✓ Avoiding disconnection
 - ✓ Safety
 - ✓ CARE customers with high energy use¹⁰
 - ✓ Selecting service from a Core Transport Agent¹¹

Education Workshops are where the caseworker provides information and engages a live audience to share their own experiences related to the subject. Most workshops are conducted at the CBO location, but often a caseworker will give a presentation at another organization or an adult school class, such as English as a Second Language (ESL) class. The eight workshop subjects are noted above. Workshop presentations and group discussions last at least 30 minutes. Afterwards, clients may arrange to visit the CBO for assistance, or when

¹⁰ Workshop added in late 2014

¹¹ Workshop added in late 2014

possible, receive immediate assistance, through the Needs and Dispute Resolution components.

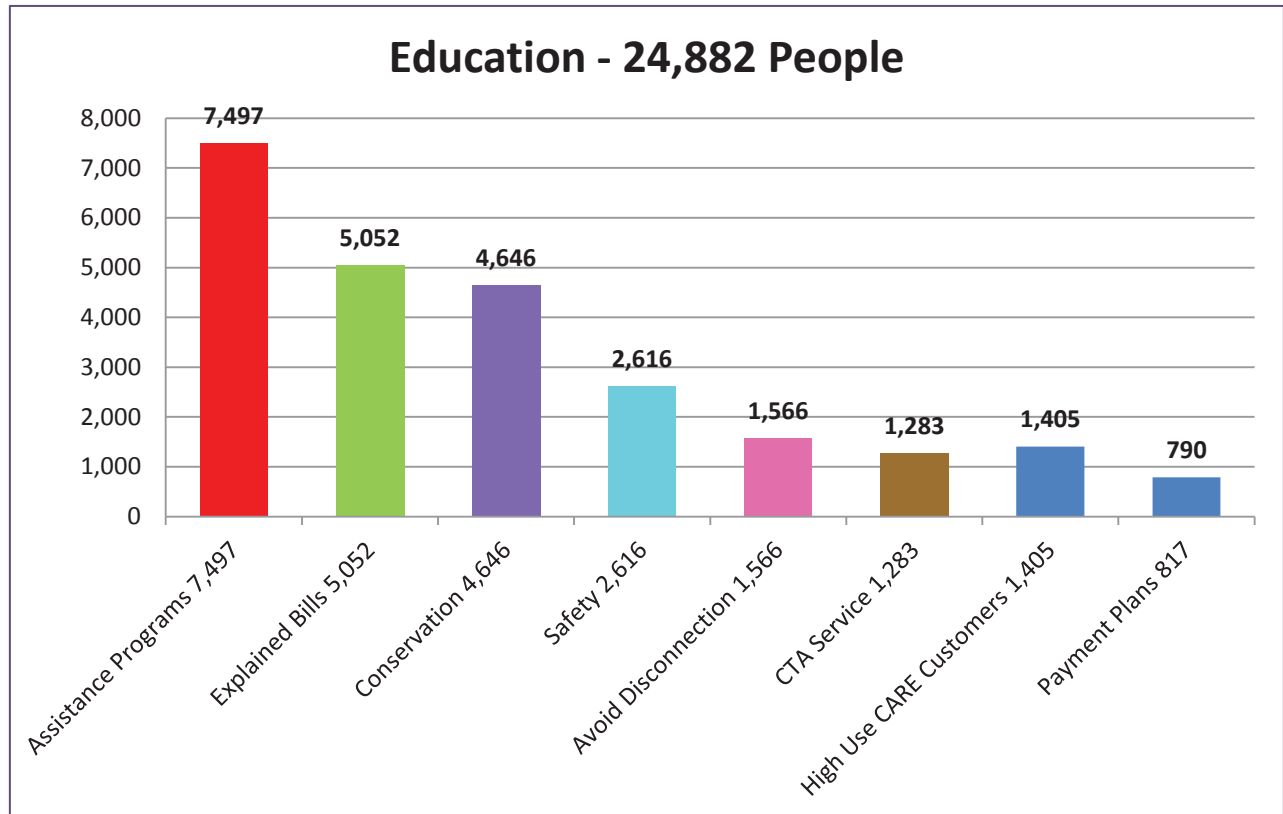
Workshop success is measured by pre- and post-tests, where the caseworker asks a question or two about the issue before and after the workshop. Pre- and post-tests are conducted verbally and the contractor has indicated that the results have been positive. CSID has attended these CBO workshops and found the caseworkers to be well prepared and successful in engaging the audience. The group discussions encourage attendees to discuss their particular situations in a positive, nonthreatening environment. Many people who attended had also brought their bills and were seeking assistance resolving them or managing payments.

During the Education Workshops, clients have asked for collateral material in their language. Currently, the CBOs provide clients with the utilities CARE, Family Electric Rate Assistance (FERA), and Medical Baseline applications, and when available, they are provided in the client's language. If the pilot becomes an ongoing program, it should have its own branding and collateral materials to hand out. CSID did not pursue this for the pilot because creating the material and securing translations of them could have taken longer than the initial duration of the pilot, and the translation costs would have been prohibitive for what was expected to be a one year pilot.

In late 2014, two more workshops were added to keep up with recent energy issues. One workshop was about switching natural gas supply from IOUs to Core Transport Agents (CTAs). It was added in response to the several LEP consumers, who had been approached by CTAs, and the consumers were requesting an understanding of what that switch might mean as far as billing and receiving consumer services. The second workshop was added in response to the energy IOUs' new practices for CARE consumers who have usage that exceeds 400 percent of baseline. The workshop explains what the practice is, what consumers must do to respond to the IOUs requirements for high use CARE customers, and how to pursue a dispute should they be removed from CARE due to high use.



The chart below shows the attendance for each of the eight subjects for 2014.





- ❖ 1,473 Total Needs and Dispute Resolution Cases, an increase of 178 cases from 2013
 - ✓ 1.92 services per case
 - ✓ \$50,152 secured for consumers

The Outreach and Education components both attract clients to seek the CBOs' help in resolving Needs and Disputes. Generally, a situation is considered a "Need" if the client indicates he or she has not made contact with the IOU and needs help or if it appears that the client can be assisted without contacting the IOU. A situation is considered a "Dispute" if the client indicates he or she has contacted the IOU but the issue was not resolved to the client's satisfaction. Both Needs and Disputes are recorded in the CHANGES database. Statistical data is provided in the monthly reports and to the IOUs in the table format the IOUs developed.¹²

Early in 2013, CSID was reviewing closed cases in the database and discovered the database was recording only one service per case. However, caseworker notes in the database showed that the caseworkers were providing more than one service.¹³ Unfortunately, the database could not be changed to record more than one service without completely redesigning it; therefore, CSID has been reviewing the notes on all of the closed cases that were initiated beginning January 1, 2013 and is tracking all of the services provided to better evaluate the services being provided.

There are 31 different services with which a client can be assisted through the Needs and Dispute Resolution process, and we have attached a table as Attachment F that lists the 31 services and their corresponding statistics. However, in evaluating the services CSID

¹² The contractor completes basic information about the contact and the IOUs check their records and provide additional information, such as if the person is enrolled in CARE. To avoid duplicity, CARE enrollments are not compensated as part of the CHANGES program, since the IOUs already have a program (CARE Capitation) where they compensate CBOs to enroll customers in CARE. However, to provide "one stop shopping," for potential CARE recipients, the CHANGES CBOs are also included in the IOUs program.

¹³ For example, a client helped with enrollment into ESAP may also receive assistance avoiding disconnection.

determined they can be classified into six different types of assistance, as shown in the following table.

<u>Needs and Disputes Services Related to Each Category</u>					
Education	Assistance Programs	Avoiding Disconnection	Conservation	Manage Accounts	Schedule Service
Understanding a bill and Baseline	LIHEAP/HEAP	Avoiding disconnection	Consultation on Conservation	Third party notification	Request meter service or test
CARE/FERA	EAF	Payment extension		Verified bill	Schedule service visit
Medical Baseline	ESAP	Set Up/Change payment plan		Set up account	Schedule energy audit
All Assistance programs	GAF	Add or Modify Level Pay plan		Change account	
	N2N	Stop disconnection		Bill adjustment	
	Medical Baseline	Restore Service		Demand Response	
	REACH	Waive/decrease deposit		Core Transport Agents	
				CARE High Use	
				Safety	

Key:

CARE – California Alternate Rates for Energy – discounted service for qualifying low-income customers.

EAF – Energy Assistance Fund – SCE financial assistance program.

ESAP – Energy Savings Assistance Program – no cost weatherization for low-income households.

FERA – Family Electric Rate Assistance – discount for families earning slightly more than CARE levels.

GAF – Gas Assistance Fund – SCG’s financial assistance program.

Level Payment Plan – a client is billed the same amount year round.

LIHEAP / HEAP – Low Income Home Energy Assistance Program / Home Energy Assistance Program – Federal programs that provide financial assistance (HEAP),weatherization, and counselling.

N2N – Neighbor to Neighbor – SDG&E’s financial assistance program.

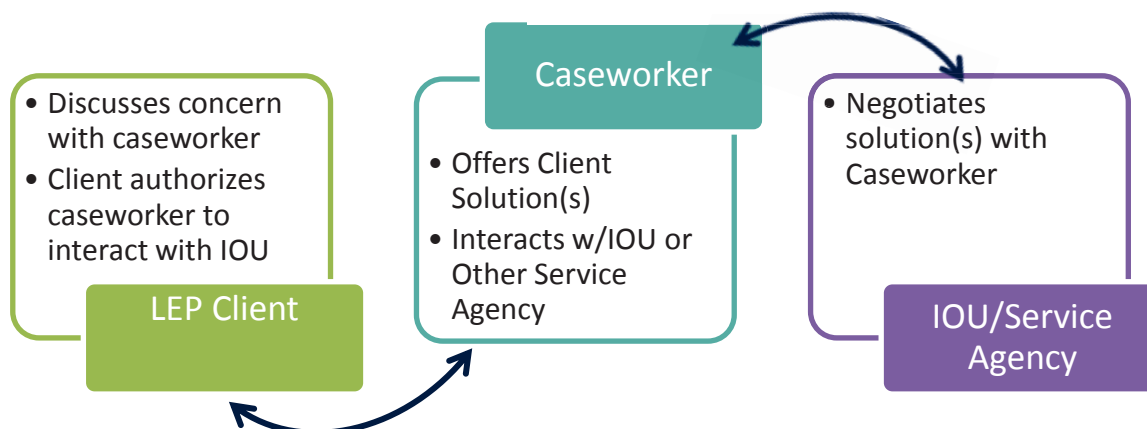
Payment Extension – agreement to pay a bill on a specific date after the bill is due.

Payment Plan – arrangements to pay one bill in increments, such as \$50/month.

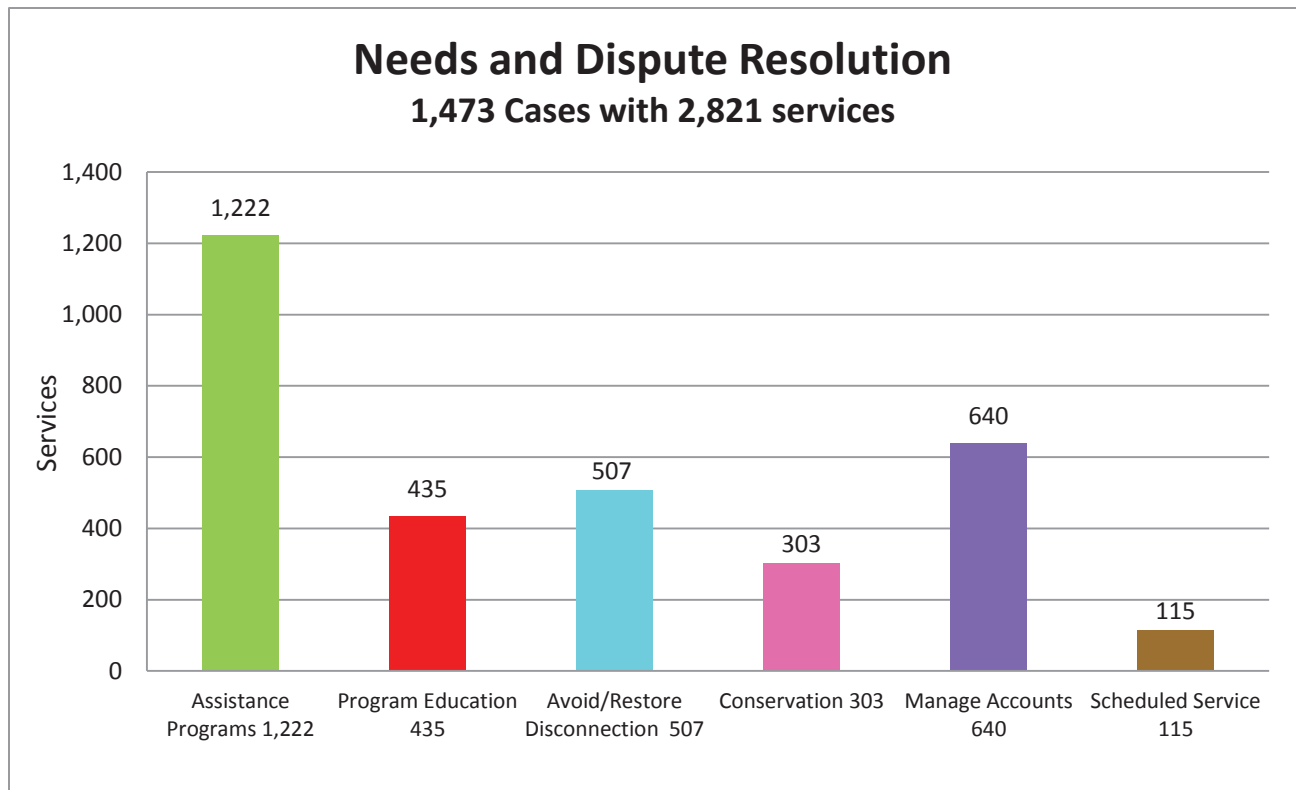
REACH – Relief for Energy Assistance through Community Help – PG&E’s financial assistance program.



Interactions between Client, Caseworker, and IOU/Service Agency



In general, Needs and Disputes receive similar treatment from the caseworker. A client discusses concerns with the caseworker, one-on-one, and the caseworker determines if he or she should contact the IOU or another agency for assistance. Then, the caseworker makes the appropriate contacts, continues to assist the client until the case is resolved, and notes the issue and the steps taken to resolve it in the database. For example, a client may meet with the caseworker with concerns that their energy service is going to be turned off because he or she cannot pay the bill. The caseworker may call a financial assistance agency to see if it can provide payment. If it can, the financial assistance agency will contact the IOU or just send in the payment. However, if the financial assistance agency will only be paying a portion of the bill, the caseworker will contact the IOU to negotiate payment arrangements, which are suitable to the client, on the total balance. Attachment G provides case notes of a few typical cases handled in 2014.



Needs and Disputes Successes

Based on several discussions with the contractor, the IOUs, and the CPUC's Energy Division, CSID determined the following criteria would be used to measure success of the Needs and Disputes components of the program:

- Assistance in the client's language.
- Assistance with or education about consumer programs.
- Assistance securing bill adjustments.
- Assistance securing payment arrangements.
- Assistance seeking financial assistance.
- Assistance avoiding disconnections.
- Assistance with securing other energy-related services, such as Medical Baseline.

CSID reviewed the 2014 data and determined the following successes:

1. 1,473 clients receive assistance in 44 languages.
2. 413 clients were assisted with enrollment, or educated about, consumer programs (services numbered 2, 6, 9, 10, 12, 23, and 24 on the attached Services Provided chart (Attachment F).
3. 7 clients received bill adjustments (service number 14 in Attachment F).
4. 200 clients received payment arrangements (services numbered 17, 18, and 28 in Attachment F).
5. 1,067 clients were assisted with financial assistance applications (services numbered 1, 2, 4, 5, and 27 in Attachment F).
6. 307 clients avoided disconnections, had service reconnected, or were educated on how to avoid disconnection (services numbered 7, 19, 21, and 22 in Attachment F).



Languages

- ❖ Communicated in 44 languages, an increase of 16 from 2013

The CPUC and the IOUs have taken measures to assist consumers in their preferred languages. The IOUs employ bilingual staff in their customer service departments, and the CPUC has certified¹⁴ several of its staff. When combined, the CPUC and IOU staff provides interpretation in 13 different languages.¹⁵ The CHANGES CBOs were able to communicate in 44 languages in 2014, both verbally and in writing. That is more than three times the amount of languages that the CPUC and IOUs collectively provide through their staff. Also, the CBOs take great care to ensure that the communications are made with cultural sensitivity, as analogies and idioms that may make sense to English speaking customers, may make no sense to LEP consumers. For example, a fact sheet was including in a 2014 training session that explained CARE High Use, and some of the CBOs have taken great care in translating the salient parts of it and obtaining approval to use it in their workshops. The attached CBO list (Attachment C) shows the languages in which the CBOs communicate.



Both the IOUs and the CPUC contract with companies that provide language interpreters over the phone. However, those companies are directed to provide word-for-word interpretations and lack the training and experience that the CBOs have received on energy services and bills.

¹⁴ California State workers must pass its language exam to become certified interpreters or translators.

¹⁵ According to the IOUs response to a data request, they collectively provide verbal assistance in English, Spanish, Mandarin, Cantonese, Vietnamese, Tagalog, Korean, and Cambodian. The CPUC provides assistance in most of those same languages plus has certified interpreters for Arabic, Armenian, Farsi, Italian, and Russian.

Funding

The CHANGES pilot has been funded through the CARE program, as provided in the California Public Utilities Code, Section 739.4 (b) (3). The CPUC approved use of CARE funds because when evaluating the TEAM program, which CHANGES is modeled after, the CPUC discovered that most of the consumers assisted by TEAM had income levels that qualified for the California LifeLine service. Qualifying income levels for California Lifeline are lower than CARE; therefore, it was a reasonable assumption that the same client type is eligible for CARE. In fact, the Needs and Dispute Resolution data shows that 94% of all of the clients assisted up through 2014 have been CARE eligible. It is reasonable to assume that CHANGES will continue to be low-income, since a significant amount of LEPs are immigrants and according to a study by the urban institute, “Immigrants’ hourly wages are lower on average than those for natives, and nearly half earn less than 200 percent of the minimum wage - versus one-third of native workers.”¹⁶

Initially, the pilot was funded at \$500,000 a year (or \$41,667 a month). Payment to the contractor was provided directly by the IOUs at levels consistent with earlier CPUC decisions related to joint IOU funding. That was:

- ✓ PG&E – 30%; \$150,000
- ✓ SDG&E – 15%; \$75,000
- ✓ SCE – 30%; \$150,000
- ✓ SCG – 25%; \$125,000

In the first year, the CBOs were so successful in providing services that the funds did not last the entire year and some clients in need of services were turned away. In the second year, funding was increased up to \$60,000 a month and kept the IOUs’ contribution percentages the same. Through 2014, the CHANGES pilot has remained within that new budget; however, the pilot has limited statewide coverage. If the program becomes an ongoing program, the program and related funding should be expanded to bring more CBOs into the program and more services, allowing for better statewide coverage.

¹⁶ Immigrant Families and Workers, brief 4, p.1



Findings

After reviewing the CHANGES pilot activities for the 2014 calendar year, CSID finds (by category)¹⁷:

1. Outreach: Outreach generated interest in the program. This is determined by an increase in attendance at Education Workshops, as well as indications in the CHANGES Needs and Dispute Resolution database that clients had learned of the service through an assortment of Outreach approaches.
2. Education Workshops: Attendees were attentive and engaged. Pre-and post-tests indicated attendees gained knowledge. The issues discussed are important to CARE eligible clients because they helped people keep their bills as low as possible. They encouraged people to enroll in services like CARE, FERA, ESAP, LIHEAP, and Medical Baseline and assisted in securing financial assistance when necessary. Several workshops taught them how to avoid disconnection, including prompt payment of bills, level payment plans, payment arrangements, and payment extensions. The one workshop that does not directly help them keep service on, relates to safety. Safety is a priority at the CPUC and with the IOUs, so we will continue this workshop as an important component to Education.
3. Needs and Dispute Resolution: Clients were assisted with enrolling in consumer programs, avoiding disconnection, securing financial assistance, receiving bill adjustments, and turning on or restoring service. Even in instances where the client could not be helped (such as when it may be determined that the bill is accurate), the caseworker still discussed ways the client could avoid future high bills and interviewed the client to determine if they may qualify for other energy related assistance programs.

¹⁷ A 2013 and 2014 comparison chart is attached (Attachment B).



Attachments

- ❖ Attachment A – California Public Utilities Code, Section 739.4
- ❖ Attachment B – CHANGES Pilot 2013 and 2014 Comparison Chart
- ❖ Attachment C – CHANGES Pilot CBO List
- ❖ Attachment D – CHANGES Pilot Referral Sources
- ❖ Attachment E – CHANGES Pilot 2014 Languages List
- ❖ Attachment F – CHANGES Pilot Services Provided
- ❖ Attachment G – Sampling of CHANGES Pilot Closed Cases in 2014



Attachment A - California Public Utilities Code, Section 739.4

739.4.

(a) Any natural gas customer who enrolls in the CARE program after the effective date of this section, but before October 1, 2001, shall receive the same one-time bill credit based on the amount of each gas corporation's average CARE customer discount applied for each month in October 2000 to March 2001, inclusive. The credit does not apply to a customer who initiates service with a gas corporation after the effective date of this section, and who has no prior history of service with the gas corporation. CARE program funds shall be used for the purpose of providing these credits. The commission shall adjust CARE program income requirements annually to reflect the increased cost-of-living due to inflation.

(b) The commission shall require all electrical and gas utilities through which CARE program rates are available to do all of the following, in multilingual formats to the extent printed and recorded information is provided, to facilitate better penetration rates for the CARE program and to protect low-income and senior households from unwarranted disconnection of necessary electric and gas services:

(1) Provide an outgoing message on all calls, where the customer is seeking to establish service or is put on hold, to customer service lines that briefly describes the CARE program in standard language approved by the commission, and that provides a toll-free phone number for customers to call to subscribe to the program or for further information.

(2) Provide information to customers about the CARE program and facilitate subscription to CARE, on all calls in which customers are making payment arrangements, on all collections calls, and on all calls for reconnection of service.

(3) (A) Provide information about the CARE program and other assistance programs, and attempt to qualify customers for CARE, and provide information about individual payment arrangements that allow customers to pay the amounts due over a reasonable period of time, not to exceed 12 months, and attempt to enroll customers in a payment arrangement program, before effecting any disconnection of service for nonpayment or inability to pay energy bills in full.



Attachment B – Changes Pilot 2013 and 2014 Comparison Chart

COMPARISON CHART		
	2013	2014
Outreach	1,773,186	3,334,175
Contacted through media	1,609,800	3,238,365
Contacted through community events	163,386	95,810
Education	14,293	24,882
Assistance Programs	4,013	7,497
Explained Bills	3,820	5,052
Conservation	2,895	4,646
Safety	1,542	2,616
Avoid Disconnection	1,233	1,566
Payment Plans	790	817
Gas Aggregation	-	1,283
CARE and High Energy Use	-	1,405
Needs and Dispute Resolution	1,295	1,473
Total Services	2,902	2,821
Services Per Case	2.2	1.92
Amount Secured for Consumers	\$20,491.00*	\$50,151.92
Assistance Programs	1,167	1,222
Conservation	358	303
Avoid/Restore Disconnection	430	507
Manage Accounts	234	640
Program Education	598	435
Scheduled Service	115	34
Language		
Languages transacted	28	44

*Amount covers the last six months of 2013 (July-December)

Attachment C – CHANGES Pilot CBO List

LIST OF CBOs IN CHANGES PILOT PROGRAM	
PG&E	
Asian Community Center (ACC Park City)	
Languages: Cantonese, Hmong, Korean	
Central California Legal Services, Inc.	
Languages: Spanish	
El Concilio of San Mateo County	
Languages: Spanish	
Lao Khmu Association, Inc.	
Languages: Cambodian, Cantonese, Hmong, Laotian, Mandarin, Vietnamese	
Self-Help for the Elderly	
Languages: Cantonese, Mandarin, Russian, Spanish, Tagalog, Taiwanese, Toisanese, Vietnamese	
Southeast Asian Community Center	
Languages: Cantonese, Mandarin, Vietnamese	
Suscol Intertribal Council	
Languages: Native American English, Spanish	
San Diego Gas & Electric Company	
Casa Familiar	
Languages: English, Spanish	
Alliance for African Assistance	
Languages: Arabic, Spanish, Karen	

Southern California Edison & Southern California Gas Company
Asian American Educational & Cultural Center, Inc.
Languages: Cambodian, Cantonese, Hmong, Indonesian, Japanese, Korean, Laotian, Mandarin, Sign Language, Spanish, Tagalog, Thai, Vietnamese
Vietnamese Community of Orange County, Inc.
Languages: Vietnamese
Campaign for Social Justice
Languages: Arabic, Armenian, Bosnian, Croatian, Dari, Farsi, Korean, Pashto, Persian, Russian, Spanish, Urdu
Chinatown Service Center
Languages: Cantonese, Korean, Mandarin, Spanish, Toisanese
Delhi Center
Languages: Spanish
International Institute of Los Angeles
Languages: Cantonese, Farsi, Spanish, Vietnamese
Koreatown Youth & Community Center
Languages: Korean, Spanish
Little Tokyo Service Center
Languages: Chinese, Japanese, Korean, Spanish, Thai
People CORE's
Languages: Cambodian, Cebuano, Chinese, Ikokano, Korean, Spanish, Tagalog, Vietnamese
Pilipino Workers Center
Languages: Tagalog

Attachment D – CHANGES Pilot Referral Sources

REFERRAL SOURCES USED		
Referral Source	2013 Y-T-D	2014 Y-T-D
Consumer Participates in Another Program at the CBO	340	428
Consumer was in a CHANGES Educational Workshop	398	440
Consumer Received TEAM Services	133	82
Consumer Received Program Information at a Community Event	88	139
Consumer Learned of the Program through Newspaper, Radio, or Television	71	160
Consumer was Referred by Friend or Family	265	304
Consumer was Referred by Another CBO	74	81
Unknown	84	0

Attachment E – CHANGES Pilot 2014 Languages List

CHANGES PILOT 2014 LANGUAGES <i>Consumer Education, Needs, and Disputes</i>				
Language	Education Y-T-D	Needs Y-T-D	Disputes Y-T-D	Total Y-T-D
Amharic	3			3
Arabic	1,037	62	37	1,136
Armenian	18	1		19
Assyrian	6			6
Bangala		1	1	2
Bengali	2			2
Burmese	29	9	1	39
Cantonese	2,504	292	19	2,815
Chaldean	19			19
Croatian	1			1
Dari	56	4		60
English	1,199	254	79	1,532
English (Native American)	1,770			1,770
Farsi	88	3	2	93
French	1			1
German	1			1
Hindi	1			1
Hmong	122	9	4	135
Ilokano	106			106
Indonesian	10			10
Japanese	609	1		610
Karen	2			2
Khmer	538	56	117	711
Korean	956	647	1	1,604
Laotian	352	11	7	370
Mandarin	98	5		103
Nepali	3	1		4
Pashto	6	4		10
Persian		2		2
Polish	1			1
Punjabi	2			2
Romanian	1	1		2
Russian	30	1		31
Somali	7	4	3	14
Spanish	7,030	286	83	7,399

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Swahili	2	6		8
Tagalog	4,450	29	8	4,487
Thai	36	2		38
Turkish	3			3
Twi		1		1
Ukrainian	2			2
Urdu	3	3		6
Vietnamese	2,401	195	33	2,629
Visayan		4		4
Total	23,505¹⁸	1,894	395	25,794

¹⁸ This amount of people is lower than what is shown under the Education section because, in some instances, more than one workshop session was provided to the same group of people.

Attachment F – CHANGES Pilot Services Provided

CHANGES PILOT SERVICES BREAKDOWN	
1. HEAP/LiHEAP Application Assistance	827
2. Energy Assistance Fund Application	46
3. ESAP Application Assistance	85
4. Gas Assistance Fund Application Assistance	106
5. N2N Application Assistance	81
6. Medical Baseline Application Assistance	70
7. Educated on avoiding disconnection	65
8. Educated on how to read the bill	154
9. Educated on CARE/FERA	83
10. Educated on Medical Baseline	9
11. Educated on Energy Efficiency/ Conservation	303
12. Educated on all energy assistance programs	189
13. Request Meter Service or Testing	23
14. Bill Adjustment	7
15. Scheduled Customer Service Visit	8
16. Scheduled Energy Audit	2
17. Set Up/Change Payment Extension	63
18. Set Up/Change Payment Plan	132
19. Stop Disconnection	176
20. Verified Bill	38
21. Waive/Decrease Deposit	35
22. Restore Service	31
23. Sign up for 3rd Party Notification	16
24. Enrolled in Demand Response Programs (electricity)	0
25. Set Up Account	76
26. Changes to Account	157

27. REACH Application Assistance	7
28. Add or Modify Level Pay Plan	5
29. Core Transport Agents*	26
30. CARE High Use Customers*	-
31. Safety*	1
Total Resolutions	2821

*The last three services were added in December 2014

Attachment G – Sampling of CHANGES Pilot Closed Cases in 2014

CHANGES PILOT CLOSED CASES IN 2014		
CASE	LANGUAGE	CASE NOTES
CASE 1	TAGALOG	<p>The customer came to the United States as an immigrant and spoke mostly a different language. This is the first time that the customer's family has considered having someone review their bill with them and help them understand it. CBO determined that the family does not qualify for discount programs. We offered to look over ways for them to better manage their monthly payment. We educated them as well on how to log in to their online account, how to use the interactive tools to help them see their daily energy use and projected monthly bill and explained in Tagalog what the details of their bill mean. We introduced the family to level pay plan and told them how this option might help them create a better monthly budget on their bills. Customer was highly interested in choosing this payment option. Called customer service to determine what the customer's monthly base payment will be if they enroll in the level pay plan. Their monthly base payment will be \$55 for their next billing cycle if they enroll now. CBO connected the customer to IOU representative for authorization in payment plan. After educating the customer on how to understand their bill and how to access their daily energy usage and projected monthly bill online, CBO introduced the level pay plan and customer became interested. After having IOU evaluate their monthly base amount, customer approved it and we arranged for their authorization to change their payment plan. CBO also gave customer resources on how to be more energy efficient in their home to avoid high energy usage for a possibility of getting credit towards the end of their level pay plan year.</p>
CASE 2	KHMER	<p>The client came over with her PG&E bill and addressed that Glacial Natural gas is the new provider. She feels that her gas bill has extremely increase, since she switch. She speak limit English and want my help in cancelling service. I looked at the bill and added all the gas procurement credit. She is being over charge for \$3.84 extra and \$46.08 a year. I call to Glacial and spoke with Anthony. I explain to Anthony about the client request. Anthony instructed me to send him an email and he will cancel the account with them. The email includes, the client information and PG&E account number. I went ahead and email it to him and Anthony respond right always. His email stated that the cancellation is confirmed and he will proceed to drop the account. Case is now able to be close.</p>

- CASE 3** SPANISH I requested payment plan at first, she stated client had to pay \$499.21 to keep services on, I requested supervisor. Transferred to supervisor Bonnie, I requested a breakdown of why bill so high, according to Bonnie client had a deposit fee added to bill after last shut off, client did pay approx \$900 in May, apparently is from old bill client signed for sister in law. I explained to Bonnie client applied for LIHEAP and pending, she stated could only lower bill to \$300.00 to avoid shut off and do rest in payment, if EOC paid \$342.00 client would have to pay the \$159.88. I then called EOC and spoke with supervisor Gilda and requested her assistance in expediting application, she stated if client had 48 notice she could contact PG&E and do a promisory via phone. Client went to PG&E and got copy of 48 notice, I then faxed to EOC and Gilda called back stating she did the promisory via telephone. Client was able to pay only \$80.00 and the rest in payments once confirmation received from PG&E that she paid the \$80.00
- CASE 4** SWAHILI Client came into my office as a last resort. He said he had received a disconnect notice and showed me his bill of close to 400 dollars. The client was a Somali refugee with a limited income who had just had a child that month. The client was clearly scared so I immediately went over his options with him. I decided CUI would be his best option but called the Changes hotline to see if we could get the disconnection changed. Upon calling the Changes hotline we spoke with Erika. I asked about the disconnect notice my client had received and the CSR said that there was never a disconnect noticed but that my client could be disconnected soon. I found this to be very confusing and asked for clarification. The CSR stated that the client wouldn't be disconnected until October but should handle the situation as soon as possible. I asked if CUI would be the best option and the CSR agreed that would be the best course of action. I counseled the client on what CUI was and provided him with all the information he would need to insure that he was prepared for the process. The client was very relieved that his electricity was not being turned off yet and said he was excited by the prospect of the HEAP assistance. The client went to CUI and received \$397.84. He was very thrilled that we could help him find a program that could assist him in his time of need.
- CASE 5** CANTONESE Client attended CHANGES community outreach event and got to know about low-income programs available. She wanted applying for LIHEAP. I helped her complete the application form since she cannot read English, and helped client made copies of all verifications docs needed.



- CASE 6** VIETNAMESE Client's income is low. He really needs payment assistance to avoid disconnection. CBO explained how to avoid disconnection, and helped client to apply for HEAP with Community Action Partnership of Orange County. Helped client to understand Level Pay Plan, and Safety.
- CASE 7** LAOTIAN The client is here today complaining, about being trick into switching to another gas company. She does not speak or read in English. Her native language is Lao. The new gas company name is Commerce Energy. The client lives in an apartment and should not be charge any gas services. The client is very upset and feels like she has been taken advantage, because she does not speak English. I looked at the client PG&E and notice that she is being charge \$2.95 a month for monthly fees. I told the client that I will help resolve this matter. I will also help her enroll in the medical baseline application. Client has many illness as well, that makes her qualified. I proceed to call to Commerce Energy and spoke to Shelly. I told Shelly that the client request to cancel and that she had no idea on what she was signing. Shelly said that the client is on a two year contract. I told her that the client is not using the gas account and she is getting a monthly charge every month. I explain to her that the client lives in an apartment and the landlord is the one taking care of all gas charges in her area. Shelly is very rude and said that there is nothing she can do. The client sign up for it and then she hung up on me. I called back and spoke to Denise at Commerce and explain everything to Denise. Denise was very nice and give me instruction on how to clear this matter up. She told me to type a letter for the client and have the client sign. This letter is to request to cancel and it state that the client does not speak English. After, have the client sign and fax back to her office. After, they receive the fax. This will be cancel without a \$50.00 early termination fee. The client is on a two contract and the contract will be remove. The client will then be transfer back to PG&E. I went ahead and started the letter. I then fax the letter Commerce Gas and fax was sent. The client was so happy, after that everything is finish. Client will be saving \$35.40 a year and will not switch again. The recovered amount was entered. Case is now able to close.



ATTACHMENT C

CHANGES Financial Summary as of, June 2015

Self Help for the Elderly
 CPUC-CHANGES Contract
 Inception to Date Cash Receipt and Cost Information
 As of June 2015
 Prepared 7/31/15

	Total 100%	PG&E 30%	SDG&E 15%	SoCAL Gas 25%	SCE 30%
Through November 2011					
Cash Received From Funders (Original Contract) (a)	512,152	153,667	76,758	127,727	154,000
Project Costs-CBOs	289,025	131,645	29,965	68,495	58,920
Project Costs-Administration	123,360	37,258	18,004	30,840	37,258
Project Costs-Database	25,000	6,250	6,250	6,250	6,250
Total Costs	437,385	175,153	54,219	105,585	102,428
Over Reimb/(Under) Reimb Through Nov 30, 2011	74,767	(21,486)	22,539	22,142	51,572
December 2011-December 2014					
Cash Received From Funders:					
December 2011-December 2012	683,748	234,000	94,462	175,858	179,428
January 2013-December 2013	720,000	216,000	108,000	180,000	216,000
January 2014-December 2014	720,000	216,000	108,000	180,000	216,000
Total Cash Received From Funders	2,198,515	644,514	333,001	558,000	663,000
Project Costs-CBOs:					
December 2011-December 2012	271,890	108,275	24,000	70,875	68,740
January 2013-December 2013	309,300	113,170	33,915	79,150	83,065
January 2014-December 2014	524,651	194,599	67,996	129,297	132,760
UPAC Credit			(6,225)		
Total Project Costs-CBOs	1,099,616	416,044	119,686	279,322	284,565
Project Costs-Administration:					
December 2011-December 2012	211,455	63,437	31,718	52,863	63,437
January 2013-December 2013	201,705	60,512	30,256	50,426	60,512
January 2014-December 2014	343,399	94,771	53,277	88,796	106,555
Total Project Costs-Administration	756,559	218,719	115,251	192,085	230,503
Project Costs-Database:					
December 2011-December 2012	-	-	-	-	-
January 2013-December 2013	11,263	3,379	1,689	2,816	3,379
January 2014-December 2014	21,240	6,372	3,186	5,310	6,372
Total Project Costs-Database	32,503	9,751	4,875	8,126	9,751
SPECIAL PROJECTS					
Project Costs-Satisfaction Survey	2,880		496	1,123	1,262
Translation of Handout Materials	15,000		3,214	5,357	6,429
Bookmarks Translation (14 Languages)	18,900		4,050	6,750	8,100
Bookmarks- Printing (16 languages, 9 versions, 8.5x1.9", Quantity: 3,222,000) Envelopes (8.75x2.5", Quantity: 360,000) Shipping & Handling, Tax (8.75%)	132,382		28,367	47,280	56,735
	169,162	-	36,127	60,510	72,525
Total Project Costs	2,057,840	644,514	275,940	540,042	597,344
Over Reimb/ (Under) Reimb Dec 2011-Dec 14 and Cumulative Through Dec 14	140,675	0	57,061	17,958	65,656
January 2015-December 2015					
Cash Received From Funders	306,000	91,800	45,900	76,500	91,800
Project Costs:					
-CBOs	186,750	68,557	28,526	44,750	44,917
-Administration	111,400	33,420	16,710	27,850	33,420
-Database	1,640	492	246	410	492
Total Project Costs	299,790	102,469	45,482	73,010	78,829
Excess Revenue over (under) Expenditures	6,210	(10,669)	418	3,490	12,971
Accumulated balance	146,885	(10,669)	57,479	21,448	78,627

(a) \$500,000 original contract plus \$12,152 additional due for November 11-30 based on CPUC order modifying monthly amount.
 -\$6,225 CBOs Cost (Dec 2014) includes UPAC credit

(End of Attachment C)